



## Prepared For:

City of Burbank  
Community Development Department  
Planning & Transportation Division  
150 North Third Street  
Burbank, CA 91502

# IKEA Retail Store Project *Environmental Impact Report*

SCH No. 2013011049



# **Final Environmental Impact Report**

## **IKEA Retail Store Project**

### **City of Burbank**

**(SCH No. 2013011049)**

#### **Prepared for:**

City of Burbank  
Community Development Department  
Planning & Transportation Division  
150 North Third Street  
Burbank, California 91502

#### **Prepared by:**

Meridian Consultants LLC  
860 Hampshire Road, Suite P  
Westlake Village, California 91361

**January 2014**

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*A disc containing both the Final EIR and Draft EIR is attached on the inside back cover.*

## 1.0 INTRODUCTION

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This Final Environmental Impact Report (Final EIR) has been prepared by the City of Burbank (City) for the proposed IKEA Retail Store Project (proposed Project). The Project Applicant (IKEA Property, Inc. [IKEA]) has filed an application to permit the development of a new IKEA retail store up to approximately 470,000 square foot (sq. ft.) in size on an approximately 23-acre site in the City of Burbank. IKEA currently has an existing store, approximately 242,000 sq. ft in size, located at 600 N. San Fernando Boulevard within the City of Burbank. The operations at this existing store will be relocated to the proposed Project site. The Project also includes the proposed extension of First Street from E. Providencia Avenue to E. Cedar Avenue to provide access to the Project site.

The City is acting as Lead Agency for the environmental review of this Project pursuant to the California Environmental Quality Act (CEQA) (Section 21000 et seq., *California Public Resources Code*) and in accordance with the *Guidelines for the Implementation of the California Environmental Quality Act* (Section 15000 et seq., *California Code of Regulations*, Title 14) because the City has the principal responsibility for approving the proposed Project.

The City, as the Lead Agency for this proposal, is required by *State CEQA Guidelines* Section 15089 to prepare a Final EIR. The Final EIR will be used by the City as part of its decision-making process, including determining appropriate conditions for the proposed Project and incorporating measures into the Project to mitigate significant environmental impacts.

### 1.1 SUMMARY OF THE REVIEW PROCESS

On January 31, 2013, the City circulated a Notice of Preparation (NOP) (State Clearinghouse Number [SCH] 2013011049) of an EIR for review and comment by the public, and responsible and reviewing agencies. The 30-day NOP review period ended on March 1, 2013. As provided by CEQA (Section 21083.9), the City held a public scoping meeting on February 4, 2013.

The City then prepared the Draft EIR, including an analysis of potential impacts related to the following 12 environmental topics:

- Aesthetics
- Air Quality
- Cultural Resources
- Geology and Soils
- Greenhouse Gases
- Hazards and Hazardous Materials
- Hydrology, Water Supply, and Water Quality
- Land Use
- Noise
- Public Services
- Traffic and Transportation
- Utilities and Service Systems

The City released the Draft EIR for a 45-day public review period beginning September 1, 2013 and ending on October 28, 2013. A Notice of Completion of the Draft EIR was provided to the State of California Governor's Office of Planning and Research State Clearinghouse for environmental review documents with copies for review by state agencies.

This Notice of Availability of the Draft EIR for review was also mailed by the City to all owners of property located within 1,000 of the Project site and others who requested this notice. In addition, the Notice of Availability was also published on September 18, 2013 in the Burbank Leader newspaper.

Following the completion of the review period for the Draft EIR, the City prepared this Final EIR as required by Section 15089 of the *Guidelines*. The Final EIR consists of the September 2013 Draft EIR, comments received by the City during the 45-day public comment period, responses to those comments, and changes to the text of the Draft EIR. Note that this Final EIR incorporates the Draft EIR by reference, and a disc containing the Draft EIR is attached to this Final EIR on the inside back cover.

As required by of the *State CEQA Guidelines* Section 15088(b), the City has provided copies of this Final EIR to each public agency that submitted comments on the Draft EIR. The Final and Draft EIR are also available for review at the following location:

City of Burbank  
Community Development Department  
Planning & Transportation Division  
150 North Third Street  
Burbank, California 91502

The documents are also available at the Burbank Public Libraries including the Central Library and the branch libraries at Buena Vista and Northwest.

In addition, the Final EIR and Draft EIR are available on the City's website:

<http://www.burbankca.gov/departments/community-development/planning-transportation/current-planning/proposed-ikea-at-805-s-san-fernando-boulevard>

## 1.2 ORGANIZATION OF FINAL EIR

As required *State CEQA Guidelines* Section 15132, the Final EIR consists of the following elements:

- The Draft EIR or a revision of the Draft EIR. The Draft EIR is incorporated by reference, and a disc containing the Draft EIR is attached to this Final EIR on the inside back cover. The Draft EIR may also

be viewed electronically, in pdf format, on the City of Burbank's (hereafter referred to as the "City") website at the above website.

- A list of persons, organizations, and public agencies commenting on the Draft EIR (see **Section 2.0**)
- Comments and recommendations received on the Draft EIR (see **Section 2.0**)
- Responses to significant environmental points raised in the review and consultation process (see **Section 2.0**)
- Revisions to the Draft EIR (see **Section 3.0** and **Appendix 1.0**)
- A Mitigation Monitoring and Reporting Program (MMRP), inclusive of revisions following the publication of the Draft EIR (attached to this document as **Appendix 1.0**)

### 1.3 DECISION-MAKING PROCESS

The City is the Lead Agency for this Final EIR because it has the principal responsibility for approving the proposed Project. The City will use the Final EIR in its decision-making process to consider the environmental effects of this proposed Project. The *State CEQA Guidelines* require that the City certify the following prior to considering approval of the proposed Project:

- The Final EIR has been completed in compliance with CEQA.
- The Final EIR was presented to the City in a public meeting and the City reviewed and considered the information contained in the Final EIR prior to considering the proposed Project.
- The Final EIR reflects the City's independent judgment and analysis (*State CEQA Guidelines* Section 15090).

The City is also required by the *State CEQA Guidelines* Section 15091 to prepare and adopt one or more written findings of fact for each significant environmental impact identified in the Final EIR. The possible findings are:

- Changes or alterations to the Project are required, which will substantially lessen or avoid the significant impacts identified in the final EIR.
- These changes or alterations are within the responsibility and jurisdiction of another public agency and not the City and these changes have been adopted, or can and should be adopted, by such other agency.
- Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final EIR.

After considering the Final EIR and these required findings, the City will consider whether to approve this Project. For any remaining significant impacts, the City may determine these impacts are acceptable due to overriding considerations identified in a Statement of Overriding Considerations as defined in the *State CEQA Guidelines* Section 15093.

## 2.0 RESPONSES TO COMMENTS

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### RESPONSE TO COMMENTS

This section provides copies of the comments submitted on the Draft EIR. Each comment set is immediately followed by the corresponding responses.

The City received a total of 13 comment letters from state agencies, local agencies, organizations, and the public. **Table 2.0-1, Commenters and Comment Letters**, lists all comments and shows the comment set identification number for each letter.

**Table 2.0-1  
Commenters and Comment Letters**

<b>Agency/Entity/Individual</b>	<b>Name of Commenter</b>	<b>Date of Comment</b>	<b>Comment Letter</b>
Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	Scott Morgan, Director State Clearinghouse	October 29, 2013	1
Native American Heritage Commission	Dave Singleton, Program Analyst	September 17, 2013	2
South Coast Air Quality Management District (SCAQMD)	Ian MacMillan, Program Supervisor, Inter-Governmental Review, Planning, Rule Development & Area Sources	October 29, 2013	3
Los Angeles County Metropolitan Transportation Authority	Nick Saponara, Development Review Manager, Countywide Planning	October 25, 2013	4
Los Angeles County Department of Public Works	Teni Mardirosian, Land Development Toan Duong, Land Development	October 23, 2013	5
Burbank Community Day School	Christine Krohn, Principal	October 25, 2013	6
Citizens Advocating Rational Development (CARD)	Nick R. Green, President	Not Dated	7
Southern California Gas Company	James Chuang, Environmental Specialist	October 17, 2013	8
Sustainable Burbank Commission	James Smith, Vice Chair	October 28, 2013	9
Nicholas de Wolff	Nicolas de Wolff	October 28, 2013	10
Mr. Ken Lewis	Ken Lewis	October 13, 2013	11
Mr. Thomas Saito	Thomas Saito	October 21, 2013	12
Engage	Maureen Kellen-Taylor, PhD, Chief Operating Officer	October 28, 2013	13



Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Ken Alex  
Director

October 29, 2013

Jesse Brown  
City of Burbank  
150 N. Third Street  
Burbank, CA 91502

Subject: IKEA Retail Store Project  
SCH#: 2013011049

Dear Jesse Brown:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 28, 2013, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

1

Please note that Section 21104(c) of the California Public Resources Code states that:

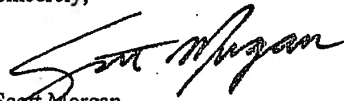
"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

2

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

  
Scott Morgan  
Director, State Clearinghouse

Enclosures

cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044  
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report  
State Clearinghouse Data Base

**SCH#** 2013011049  
**Project Title** IKEA Retail Store Project  
**Lead Agency** Burbank, City of

**Type** EIR Draft EIR  
**Description** IKEA Property Inc. has filed an application to permit the development of a new IKEA retail store on an approximately 23 acre site in the City of Burbank. The project involves the construction of a new 470,000 sf IKEA retail store with 1,726 parking spaces, and an extension of First Street from its current terminus at E. Santa Anita Ave. to the project site located at 805 S. San Fernando Boulevard in Burbank. Discretionary approvals requested include approval of a Planned Development as defined in the City of Burbank Municipal Code to provide unified development standards for the site, a Development Agreement, Development Review, and a tentative tract map.

**Lead Agency Contact**

**Name** Jesse Brown  
**Agency** City of Burbank  
**Phone** (818) 238-5250  
**Fax**  
**email**  
**Address** 150 N. Third Street  
**City** Burbank  
**State** CA **Zip** 91502

**Project Location**

**County** Los Angeles  
**City** Burbank  
**Region**  
**Lat / Long** 34° 10' 30" N / 118° 18' 15" W  
**Cross Streets** S. San Fernando Blvd./E. Elmwood Ave  
**Parcel No.** Primary: 2453 033 022  
**Township** 1S **Range** 13W **Section** **Base** SBB&M

**Proximity to:**

**Highways** I-5  
**Airports** Burbank-Pasadena-Glendale  
**Railways** Southern Pacific  
**Waterways**  
**Schools** Burbank Comm. Day School  
**Land Use** Use: Light Industrial/Z: Burbank Center Commercial Manufacturing/GP: Mixed Commercial/Office/Industrial

**Project Issues** Air Quality; Archaeologic-Historic; Drainage/Absorption; Geologic/Seismic; Noise; Public Services; Sewer Capacity; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Landuse; Other Issues; Aesthetic/Visual

**Reviewing Agencies** Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Native American Heritage Commission; Public Utilities Commission

**Date Received** 09/12/2013 **Start of Review** 09/12/2013 **End of Review** 10/28/2013

**RESPONSE TO LETTER 1: Governor's Office of Planning and Research, State Clearinghouse and Planning Unit, dated October 29, 2013**

- 1-1** The comment states that the Clearinghouse is providing a list of state agencies that reviewed the Draft EIR and forwarding the comments received from the Native American Heritage Commission.

The City acknowledges receipt of the comment letter from the Native American Heritage Commission, which was included it in the Final EIR as letter Number 2.

- 1-2** The comment notes that the *Public Resources Code* Section 21104(c) requires that responsible or other agencies shall only make substantive comments regarding those activities involved in a project, which are within an area of expertise of the agency or which are to be carried out or approved by the agency.

The City acknowledges this comment noting that the *Public Resources Code* Section 21104(c) requires that responsible or other agencies shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are to be carried out or approved by the agency.

- 1-3** This comment states that the City has complied with the State Clearinghouse requirements for review of draft environmental documents pursuant to the *State CEQA Guidelines*.

The City acknowledges this comment.

STATE OF CALIFORNIA

Edmund G. Brown, Jr., Governor

**NATIVE AMERICAN HERITAGE COMMISSION**

1550 Harbor Boulevard  
West Sacramento, CA 95691  
(916) 373-3715  
(916) 373-5471 -- FAX  
e-mail: ds\_nahc@pacbell.net

September 17, 2013

Mr. Jesse Brown, Senior Planner

**City of Burbank**

150 North Third Street  
Burbank, CA 91502

RE: SCH#2013031055 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the **"IKEA Retail Store Project;"** located in the City of Burbank Los Angeles County, California

Dear Mr. Brown:

The Native American Heritage Commission (NAHC) has reviewed the CEQA Notice regarding the above referenced project. In the 1985 Appellate Court decision (170 Cal App 3<sup>rd</sup> 604), the court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites.

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine :If a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s), The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a

clear  
10/28/13  
**RECEIVED**  
SEP 23 2013  
STATE CLEARING HOUSE

1

2

3

4

separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

4

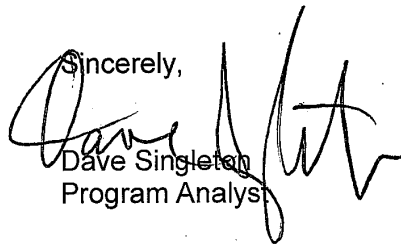
A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources. Lack of surface evidence of archeological resources does not preclude their subsurface existence.

5

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Health & Safety Code Section 7050.5 and California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f). Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans. Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

6

Sincerely,



Dave Singleton  
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

**Native American Contacts  
Los Angeles County  
September 17, 2013**

**Beverly Salazar Folkes**

1931 Shadybrook Drive  
Thousand Oaks, CA 91362  
folkes9@msn.com  
805 492-7255  
(805) 558-1154 - cell  
folkes9@msn.com

Chumash  
Tataviam  
Fernandeño

LA City/County Native American Indian Comm  
Ron Andrade, Director  
3175 West 6th St, Rm. 403  
Los Angeles, CA 90020  
randrade@css.lacounty.gov  
(213) 351-5324  
(213) 386-3995 FAX

Tongva Ancestral Territorial Tribal Nation  
John Tommy Rosas, Tribal Admin.  
Private Address  
Gabrielino Tongva  
tattnlaw@gmail.com  
310-570-6567

Kitanemuk & Yowlumne Tejon Indians  
Delia Dominguez, Chairperson  
115 Radio Street  
Bakersfield, CA 93305  
deedominguez@juno.com  
(626) 339-6785

Yowlumne  
Kitanemuk

**San Fernando Band of Mission Indians  
John Valenzuela, Chairperson**

P.O. Box 221838  
Newhall, CA 91322  
tsen2u@hotmail.com  
(661) 753-9833 Office  
(760) 885-0955 Cell  
(760) 949-1604 Fax

Fernandeño  
Tataviam  
Serrano  
Vanyume  
Kitanemuk

**Gabrielino/Tongva San Gabriel Band of Mission  
Anthony Morales, Chairperson**

PO Box 693  
San Gabriel, CA 91778  
GTTribalcouncil@aol.com  
(626) 286-1632  
(626) 286-1758 - Home  
(626) 286-1262 -FAX

Gabrielino Tongva

Randy Guzman - Folkes  
6471 Cornell Circle  
Moorpark, CA 93021  
ndnRandy@yahoo.com  
(805) 905-1675 - cell

Chumash  
Fernandeño  
Tataviam  
Shoshone Paiute  
Yaqui

Gabrielino /Tongva Nation  
Sandonne Goad, Chairperson  
P.O. Box 86908  
Los Angeles, CA 90086  
sgoad@gabrielino-tongva.com  
951-845-0443

Gabrielino Tongva

**This list is current only as of the date of this document.**

**Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.**

his list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2013011049; cEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the IKEA Retail Store Project; located in the City of Burbank; Los Angeles County, California.

**Native American Contacts  
Los Angeles County  
September 17, 2013**

Gabrielino Tongva Indians of California Tribal Council  
Robert F. Dorame, Tribal Chair/Cultural Resources  
P.O. Box 490                      Gabrielino Tongva  
Bellflower , CA 90707  
**gtongva@verizon.net**  
562-761-6417 - voice  
562-761-6417- fax

Gabrielino-Tongva Tribe  
Conrad Acuna,  
P.O. Box 180                      Gabrielino  
Bonsall , CA 92003  
  
760-636-0854 - FAX

Gabrielino-Tongva Tribe  
Bernie Acuna, Co-Chairperson  
P.O. Box 180                      Gabrielino  
Bonsall , CA 92003  
(619) 294-6660-work  
(310) 428-5690 - cell  
(760) 636-0854- FAX  
bacuna1@gabrielinotribe.org

Gabrielino /Tongva Nation  
Sam Dunlap, Cultural Resources Director  
P.O. Box 86908                      Gabrielino Tongva  
Los Angeles , CA 90086  
samdunlap@earthlink.net  
909-262-9351

Gabrielino-Tongva Tribe  
Linda Candelaria, Co-Chairperson  
P.O. Box 180                      Gabrielino  
Bonsall , CA 92003  
palmsprings9@yahoo.com  
626-676-1184- cell  
(760) 636-0854 - FAX

Gabrieleno Band of Mission Indians  
Andrew Salas, Chairperson  
P.O. Box 393                      Gabrielino  
Covina , CA 91723  
gabrielenoindians@yahoo.  
(626) 926-4131

**This list is current only as of the date of this document.**

**Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.**

his list s only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2013011049; cEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the IKEA Retail Store Project; located in the City of Burbank; Los Angeles County, California.

**RESPONSE TO LETTER 2: Native American Heritage Commission, dated September 17, 2013**

- 2-1** The comment notes that the Native American Heritage Commission (NAHC) has jurisdiction for the State of California over Native American resources, including archaeological places of religious significance and burial sites.

The City acknowledges that the NAHC has jurisdiction over Native American resources in the State of California, including archaeological places of religious significance and burial sites.

- 2-2** The comment notes that CEQA requires that any project that causes a substantial adverse change in the significance of an historical resource, including archaeological resources, is a significant effect requiring preparation of an environmental impact report (EIR).

The City prepared and circulated a Draft EIR for review in accordance with the requirements of CEQA. The Draft EIR addresses Cultural Resources, including archaeological resources in Section 5.3 of the Draft EIR.

- 2-3** The comment notes that the lead agency is required to assess whether the proposed project will have an adverse impact on cultural resources, including archaeological resources, within the area affected by the proposed project. The lead agency is required to assess whether the project will have an adverse impact on such resources within the “area of potential effect (APE),” and if so, mitigate that effect.

The EIR includes an evaluation of cultural resources within the proposed project area for the known areas of disturbance. The EIR (see Section 5.3.5) includes analyses of potential impacts to cultural resources, including archaeological resources. Where the EIR determines that there is the potential for significant impact, mitigation measures are also identified.

Please note that in addition to complying with the requirements of CEQA, the City also notified local tribal representatives pursuant to Section 65352.3 of the *Government Code* and provided an opportunity to consult on any potential effect on Native American resources. No responses were received by the City in response to this notification.

While no site-specific surveys were conducted as part of the Draft EIR, the analysis relied on recent (April 2010) record searches completed for the City’s *Burbank2035* General Plan Technical Background Report (TBR).<sup>1</sup> The TBR included record searches for the entire General

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1 City of Burbank, *Burbank2035* Technical Background Report (July 2012).

Plan project area, which included the Project site, from the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System. The purpose of the SCCIC search was to identify previously recorded archaeological sites and historic resources and obtain information on previously conducted cultural resources surveys in the city. The SCCIC search included an examination of background historic resources for the following:

- California State Historic Resources Inventory
- City of Los Angeles Historic-Cultural Monuments
- California Historic Landmarks (1996)
- National Register of Historic Places (1996 and 2000)
- California Points of Historical Interest (1992 and updates)
- California Register of Historical Resources
- Santa Monica (1902, 1921) 15 Foot U.S. Geologic Survey (USGS) quadrangle maps
- City of Burbank local register of Designated Historic Resources

Based on these record searches, archaeological and other historic resources located within the City were identified. Further, as part of the *Burbank2035* environmental review, the City contacted the NAHC requesting a search of the Sacred Lands files and the contact information for Native American groups or individuals who might have information or concerns regarding cultural resources within the City. No resources were identified within the Project site or in the immediately adjacent areas.

- 2-4** The comment notes that if any additional archaeological inventory survey is determined to be required, a professional report should be prepared detailing the findings.

The Project site includes the Main Site, where the new IKEA retail store is planned at 805–807 S. San Fernando Boulevard and the First Street Extension Area, which include the adjacent properties on E. Cedar Avenue, E. Providencia Avenue, and E. Santa Anita Avenue. The Project site is located in a portion of the City of Burbank historically developed with industrial uses related to aviation. As the site has been historically developed, and as discussed in **Response 2-3**, there are no known resources on the site; thus, the City determined no additional survey was required.

- 2-5** The comment suggest that early consultation with Native American tribes be conducted to avoid unanticipated discoveries and to access knowledge of religious and cultural significance of historic properties in the Project area.

The City acknowledges that lack of surface evidence of archaeological resources does not preclude their subsurface existence. For this reason, the Draft EIR includes **Mitigation Measure 5.3-3** to address the treatment of undiscovered human remains including those of Native Americans; the measure notes that those requirements are addressed in *California Health and Safety Code* Sections 7050.5 and 7052 and *California Public Resources Code* Section 5097. Further, it states that if human remains are uncovered during ground-disturbing activities, all such activities within a 100-foot radius of the find shall be halted immediately and the project applicants' designated representative shall be notified. The project applicant shall immediately notify the county coroner and a qualified professional archaeologist. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or State lands (*Health and Safety Code* Section 7050.5[b]). If the coroner determines that the remains are those of a Native American, he or she must contact the NAHC by phone within 24 hours of making that determination (*Health and Safety Code* Section 7050[c]). The project applicants' responsibilities for acting upon notification of a discovery of Native American human remains are identified in detail in the *California Public Resources Code* Section 5097.9. The City of Burbank or its appointed representative and the professional archaeologist are then required to contact the most likely descendent (MLD), as determined by the NAHC, regarding the remains. The MLD, in cooperation with the property owner and the lead agencies, would then determine the ultimate disposition of the remains.

Should any resources be encountered during grading and other construction activities on the site, the City will consult with appropriate Native American contacts as suggested by the NAHC.

- 2-6** The comment notes that lead agencies should include provisions in their mitigation plan for the identification and evaluation of accidentally discovered archaeological resources.

*Public Resources Code* (PRC) Section 21083.2 is the statutory authority for the *State CEQA Guidelines* Section 15064.5. As noted in **Response to Comment 2-5**, the EIR (pages 5.3.20 and 21) includes **Mitigation Measure 5.3.3** should any human remains or other resources be discovered during grading that require compliance with these section of the PRC and *State CEQA Guidelines*.



## South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • www.aqmd.gov

E-Mailed: October 29, 2013  
pprescott@burbankca.gov

October 29, 2013

Mr. Patrick Prescott  
City of Burbank  
150 North Third Street  
Burbank, California 91502

### **Review of the Draft Environmental Impact Report (Draft EIR) for the IKEA Retail Store Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the Lead Agency and should be incorporated into the final environmental impact report (EIR) as appropriate.

The proposed project is located on a previous industrial land use site that contains residual soil and soil vapor contamination. As a result, the SCAQMD staff is concerned about the potential localized air quality impacts from soil disturbance activities required for construction of the proposed project. Therefore, the SCAQMD staff recommends that the Lead Agency update the localized air quality analysis to include revised modeling information based on the enclosed comments. Further, the SCAQMD staff is concerned about the significant regional operational air quality impacts from the proposed project. Specifically, the Lead Agency determined that the project will exceed the SCAQMD's CEQA regional significance thresholds for NO<sub>x</sub>, CO and PM<sub>10</sub> emissions during operation of the project. Therefore, the SCAQMD staff recommends that pursuant to Section 15126.4 of the CEQA Guidelines the Lead Agency require the additional mitigation measures in the final EIR. Details regarding these comments are attached to this letter.

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Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the

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Mr. Patrick Prescott

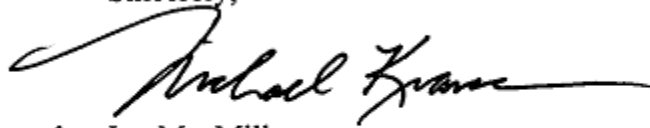
2

October 29, 2013

Lead Agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

3

Sincerely,



for Ian MacMillan  
Program Supervisor, Inter-Governmental Review  
Planning, Rule Development & Area Sources

[MK:DG](#)

LAC130913-01  
Control Number

Mr. Patrick Prescott

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October 29, 2013

### Regional Operational Air Quality Impacts

1. The Lead Agency determined that the proposed project will exceed the CEQA regional operational significance thresholds for NO<sub>x</sub>, CO and PM<sub>10</sub> emissions. Therefore, SCAQMD staff recommends that the Lead Agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

#### Additional Operational Mitigation Measures - Transportation

- a) Provide electric car charging stations for employees and customers. Also, provide designated areas for parking of zero emission vehicles (ZEVs) for car-sharing programs.
- b) Provide incentives to encourage public transportation and carpooling.
- c) Provide incentives for employees and the public to use public transportation such as discounted transit passes, reduced ticket prices at local events, and/or other incentives.
- d) Implement a rideshare program for employees.
- e) Create a local "light vehicle" networks, such as neighborhood electric vehicle (NEV) system.
- f) Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

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#### Additional Operational Mitigation Measures - Other

- g) Require use of electric lawn mowers and leaf blowers.
- h) Require use of electric or alternatively fueled sweepers with HEPA filters.

### Localized Air Quality Analysis

2. An in-stack ratio (ISR) of NO<sub>2</sub>/NO<sub>x</sub> of 0.1 was used in the air dispersion modeling for NO<sub>x</sub>. The June 28, 2010 memo from EPA ([http://www.epa.gov/ttn/scram/guidance/clarification/ClarificationMemo\\_AppendixW\\_Hourly-NO2-NAAQS\\_FINAL\\_06-28-2010.pdf](http://www.epa.gov/ttn/scram/guidance/clarification/ClarificationMemo_AppendixW_Hourly-NO2-NAAQS_FINAL_06-28-2010.pdf)) specifically states that "the 0.1 in-stack ratio often cited as the "default" ratio for OLM should not be treated as a default value for hourly NO<sub>2</sub> compliance demonstrations" In addition, EPA's guidance issued on March 1, 2011 ([http://www.epa.gov/ttn/scram/guidance/clarification/Additional\\_Clarifications\\_AppendixW\\_Hourly-NO2-NAAQS\\_FINAL\\_03-01-2011.pdf](http://www.epa.gov/ttn/scram/guidance/clarification/Additional_Clarifications_AppendixW_Hourly-NO2-NAAQS_FINAL_03-01-2011.pdf)) allowed for a default ISR of 0.5 in the absence of more appropriate source-specific information. A default ISR of 0.5 should be used in NO<sub>2</sub> modeling unless it can be demonstrated according to EPA methodology that another ISR value is appropriate.
3. The IKEA Home Furnishing Store Project Localized Significance Threshold Analysis, dated June 2013, in Appendix 5.2, states that the five years of available AERMOD meteorological data was reviewed to identify the calendar year which produced the highest pollutant concentrations. The appendix states that based on that

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review, the 2009 data set was identified as producing the highest pollutant concentration. The meteorological data analysis does not appear to be included in the materials provided to the SCAQMD. This analysis should be included in the Final EIR or all five years of meteorological data should be used in the air dispersion modeling to demonstrate that the appropriate maximum concentrations were identified.

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**RESPONSE TO LETTER 3: South Coast Air Quality Management District, dated October 29, 2013**

- 3-1** The comment notes that South Coast Air Quality Management District (SCAQMD) staff recommends that the Lead Agency update the localized air quality analysis to include revised modeling information.

The City, as Lead Agency, has reviewed the comments provided by SCAQMD relative to the localized air quality analysis. As discussed in **Response to Comment 3-5**, the City has reviewed the suggestions from the SCAQMD and found the suggested changes to the modeling are not appropriate for the proposed Project. The recommended changes would also not result in any substantial change to the results.

- 3-2** SCAQMD staff have expressed concern regarding the significant regional operational air quality impacts from the proposed Project that will exceed significance thresholds for nitrous oxide (NO<sub>x</sub>), carbon monoxide (CO), and particulate matter less than 10 microns (PM<sub>10</sub>), and recommends additional mitigation measures.

The City reviewed the additional measures suggested by SCAQMD staff to further mitigate these air quality impacts and appreciates the District's suggestion. However, the Project has incorporated a number of features that will reduce air emissions, including NO<sub>x</sub>, CO, and PM<sub>10</sub> emissions from the Project, and determined that these additional measures are not necessary. Because the measures suggested would not substantially lessen the impacts of the Project and other equally effective measures are proposed.

As described in the Project Description (see Draft EIR Section 3.4), the proposed Project includes a variety of sustainability and green building and operating features that will reduce emissions of NO<sub>x</sub>, CO, and PM<sub>10</sub>, as well as reduce greenhouse gases. These features include using energy conserving products for the lighting system; a heating, ventilation, and air conditioning system; rechargeable electric forklifts; and the installation of shade trees. Other Project features that will reduce emissions include:

- Solar photovoltaic electricity for building. As it does atop the existing IKEA store in Burbank, IKEA plans to include an array of solar panels on the roof located between rooftop equipment and skylights. The final solar array will be a building-specific design likely consisting of a 1,200-kilowatt (kW) system capable of producing approximately 1,750,000 watt-hours (Wh) of electricity annually. The system will result in reducing the equivalent of at least 1,235 tons of carbon dioxide (CO<sub>2</sub>) (this would be equal to eliminating the emissions of 257 cars or powering 185 homes yearly).

- A location for clean energy fuel cells that can run on natural gas as well as renewable fuels such as treated biogas.
- Low volatile organic compound (VOC) paint.

The Project has also been planned to reduce vehicle use to the extent possible given the characteristics of the proposed retail commercial use by improving pedestrian access. Additionally, bus stops for Metro Line 94 on S. San Fernando Boulevard near Elmwood Avenue will be provided on both sides of the street at this driveway. These stops will be designed in coordination with the City and Metro and will provide direct transit access to the Project site.

In addition to the mitigation measures identified in Section 5.2, Air Quality in the Draft EIR and as discussed in Section 5.5, Greenhouse Gas, the Project will also be required to comply with the *Burbank2035* General Plan policies to reduce greenhouse gas (GHG) emissions by complying with the Sustainability Action Plan, the Green Building Code, and the Greenhouse Gas Reduction Plan (GGRP), which are all designed to reduce GHG emissions programmatically for the City. The GGRP is the City's primary programmatic plan that incorporates important aspects of the other policies and regulations in the *Burbank2035* General Plan and is designed to identify specific design features for individual projects. For long-term operational emissions, the *Burbank2035* General Plan encourages the adoption of GHG reduction goals for the City through Air Quality and Climate Change Element Policies 3.1 and 3.2. Further, the GGRP achieves implementation of these policies as it includes reduction measures and actions to reduce communitywide emissions.

The reduction measures include mandatory and voluntary measures. Mandatory measures reinforce the implementation of existing Burbank codes and ordinances, or direct changes to the City's codes and ordinance as action items for the City to create community-wide reduction in air quality emissions. The voluntary measures rely on voluntary participation from the community to create communitywide emission reductions. The Project incorporates all mandatory and voluntary GHG reduction measures that are applicable to the Project. There are a total of 14 voluntary measures with which the Project will be consistent. These measures and features are consistent with existing recommendations to reduce GHG emissions.

Given that the Project meets the City's requirements and includes a variety of mandatory and voluntary features to reduce emissions, the additional mitigation measures suggested are not considered warranted or necessary.

- 3-3** SCAQMD requests that written responses to all comments submitted be provided prior to the adoption of the Final EIR.

In accordance with the requirements of the *State CEQA Guidelines* Section 15088(b), the City provided written responses to all public agencies that commented on the Draft EIR, including the SCAQMD, 10 days prior to the public hearing to consider certification of the Final EIR.

- 3-4** The comment notes that the City, as Lead Agency, has determined that the proposed Project will exceed regional operational significance thresholds for NO<sub>x</sub>, CO, and PM<sub>10</sub> emissions. As such, SCAQMD staff recommends that the City incorporate additional mitigation measures into the proposed Project.

The City has reviewed the suggestions identified by the SCAQMD, as discussed further below.

The comment suggests that the Project include electric car charging stations for employees and customers. Also, that designated areas for parking of zero-emission vehicles (ZEVs) for car-sharing programs be provided.

The City of Burbank and Burbank Water and Power (BWP) are committed to supporting Electric Vehicles (EV).<sup>2</sup> There are 11 electric vehicle-charging stations located in Burbank. Nine are in the downtown area and two are near the Lakeside shopping center on Pass Avenue. Each station has both a level 1 (120 V) and a level 2 (240V) charger. The City and BWP continue to look for opportunities to improve access to such stations. The City will evaluate the need for additional charging stations at the Project site as possible conditions of approval on the Planned Development Zoning proposed for the Project.

The Project components and City identified mitigation measures already include a number of the suggested measures, including:

- Provide incentives to encourage public transportation and carpooling.

The proposed Project is subject to the City's Transportation Demand Management (TDM) Program. The Project site is also located within the Burbank Center Plan, which entails additional requirements on developments that meet certain characteristics.

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<sup>2</sup> Burbank Water and Power. Electric Vehicles website. <https://www.burbankwaterandpower.com/electric-vehicles>. Accessed December 30, 2013.

Because the Project would employ 25 or more people, the applicant or its successors will be required to join the Burbank Transportation Management Organization (Burbank TMO). As a member of the Burbank TMO, the Project will be required to train an on-site TDM coordinator and is subject to annual trip reduction reporting requirements to the City, with a target of reducing weekday afternoon peak hour trips.

The proposed IKEA Store, similar to the existing IKEA store, would become a member of the Burbank TMO. The Burbank TMO promotes transit usage and other nonautomotive modes of travel for employees and residents in and around the City of Burbank through:

- Directly providing transit and ridesharing services and working with employers and property owners to provide incentives for using alternative modes of transportation
- Advocating for public policy supporting alternative transportation

Further, the applicant currently operates a store at 600 N. San Fernando Boulevard and complies with the requirements of the TMO and will comply at new store.

- Provide incentives for employees and the public to use public transportation such as discounted transit passes, reduced ticket prices at local events, and/or other incentives.

As noted, the City's TDM Program requires all large site operators to join the TMO and to participate in annual trip reduction reporting requirements to the City, with a target of reducing weekday afternoon peak hour trips.

- Implement a rideshare program for employees.

The proposed IKEA Store, similar to the existing IKEA store, would become a member of the Burbank TMO. The Burbank TMO promotes transit usage and other nonautomotive modes of travel for employees and residents in and around the City of Burbank through:

- Directly providing transit and ridesharing services and working with employers and property owners to provide incentives for using alternative modes of transportation
- Advocating for public policy supporting alternative transportation
- Create a local "light vehicle" network, such as neighborhood electric vehicle (NEV) system.

The use of a light vehicle program, such as NEVs, is a Citywide goal as noted in the *Burbank2035* General Plan, which includes numerous goals, policies, and programs that would impact future emissions associated with land use operations. Transportation Demand

Management would provide new and existing land uses with higher accessibility to alternate modes of transportation and supporting amenities, some of which would be emission free. As stated in Policy 1.9, the City encourages the use ZEVs, low-emission vehicles, bicycles, and other no-motorized vehicles, and car-sharing programs by requiring sufficient and convenient infrastructure and parking facilities in residential developments and employment centers to accommodate these vehicles.

All projects must comply with *Burbank2035* policies to minimize long-term operational emissions. These measures would ensure that projects are developed to maximize the use of alternative modes of transportation and encourage the use of non-vehicular transportation.

- Require the use of 2010 compliant diesel trucks, or alternatively fueled delivery trucks (e.g., food, retail, vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this is not feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
- IKEA's trucks fleet will comply with the California Air Resources Board (CARB) requirements.

All owners of diesel trucks that operate in California are required to take steps to reduce air pollution. Reducing emissions from existing equipment is necessary to meet federally imposed clean air standards and to reduce the adverse health effects from pollution. Diesel trucks with a gross vehicle weight rating (GVWR) more than 14,000 lbs. that are owned by private or federal government fleets must reduce exhaust emissions by meeting particulate matter filter requirements and upgrading to 2010 model year (MY) or newer engines. Other vehicles with a GVWR more than 14,000 lbs. need engine upgrades and must upgrade no later than January 1, 2023, depending on the engine model year.

- Require the use of electric lawn mowers and leaf blowers, and electric or alternatively fueled sweepers with high-efficiency particulate absorption (HEPA) filters.

The Project does not include grass that will require mowing. The landscape plan, Figure 3.0-12 in the Draft EIR, provides the preliminary plant components. As such, lawn mowers are not required.

It is anticipated that IKEA will contract landscaping and parking lot sweeping services; as such, the contractor will be required to comply with all local and regional landscaping and sweeping equipment. In addition, it is important to note that HEPA filters are designed to arrest very fine particles effectively, but do not filter out gasses and odor molecules.

Circumstances requiring filtration of volatile organic compounds call for the use of an activated carbon (charcoal) filter instead of or in addition to a HEPA filter. The use of either HEPA or activated carbon filters would also be at the discretion of the sweeping contractors and compliance with local and regional air quality requirements.

- 3-5** The SCAQMD recommends revising some of the input parameters for the localized air dispersion modeling of NO<sub>x</sub> based on the recommendation contained in a memorandum from the U.S. Environmental Protection Agency (EPA) In March 2011.<sup>3</sup> The EPA states that “the 0.1 in-stack ratio often cited as the ‘default’ ratio for ozone-limiting method (OLM) should not be treated as a default value for hourly NO<sub>2</sub> compliance demonstrations.” Further, SCAQMD cites additional guidance from the EPA released in March 2011,<sup>4</sup> recommending that the amount for a default in-stack ratio of 0.5 be used in the absence of more appropriate source-specific information. A default in-stack ratio of 0.5 should be used in NO<sub>2</sub> modeling unless it can be demonstrated according to EPA methodology that another in-stack ratio value is appropriate.

The City has reviewed the EPA memorandum cited by the SCAQMD. As noted in this memorandum, to ease the burden on permit applicants in addressing the need to demonstrate compliance with the 1-hour NO<sub>2</sub> National Ambient Air Quality Standards (NAAQS), as well as the burden on the permitting authority in reviewing such applications, the EPA offers recommendations in relation to the use of Tier 2 and Tier 3 options. Specifically, the EPA recommends the following:

- The use of 0.80 as a default ambient ratio for the 1-hour NO<sub>2</sub> standard under Tier 2 without additional justification by applicants
- A general acceptance of 0.50 as a default in-stack ratio of NO<sub>2</sub>/NO<sub>x</sub> for input to the Plume Volume Molar Ratio Method (PVMRM) and Ozone Limiting Method (OLM) options within AERMOD, in the absence of more appropriate source-specific information on in-stack ratios.

The EPA March 2011, memorandum also notes that the lack of definitive in-stack data and concedes that “in-stack NO<sub>2</sub>/NO<sub>x</sub> ratios [are] still limited for many source categories,” and they

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3 U.S. Environmental Protection Agency (EPA), Memorandum – Subject of Appendix W Modeling Guidance for the 1-hour NO<sub>x</sub> National Ambient Air Quality Standard, from Tyler Fox, Leader, Air Quality Modeling Group, C439-01 (June 28, 2010), [http://www.epa.gov/ttn/scram/guidance/clarification/ClarificationMemo\\_AppendixW\\_Hourly-NO2-NAAQS\\_FINAL\\_06-28-2010.pdf](http://www.epa.gov/ttn/scram/guidance/clarification/ClarificationMemo_AppendixW_Hourly-NO2-NAAQS_FINAL_06-28-2010.pdf).

4 U.S. EPA, Memorandum – Additional Clarification Regarding Application of Appendix W Modeling Guidance for the 1-hour NO<sub>x</sub> National Ambient Air Quality Standard, from Tyler Fox, Leader, Air Quality Modeling Group, C439-01 (March 1, 2011), [http://www.epa.gov/ttn/scram/guidance/clarification/Additional\\_Clarifications\\_AppendixW\\_Hourly-NO2-NAAQS\\_FINAL\\_03-01-2011.pdf](http://www.epa.gov/ttn/scram/guidance/clarification/Additional_Clarifications_AppendixW_Hourly-NO2-NAAQS_FINAL_03-01-2011.pdf).

“hope that over time the range of source categories for which in-stack ratio information is available increases and the quality of such information will improve.”

The localized significance threshold (LST) analysis in the Draft EIR for the proposed Project utilized a traditional in-stack ratio of 10 percent (0.1), which is consistent with the California Air Pollution Control Officers Association (CAPCOA) recommendation for the heavy duty diesel mobile source category.<sup>5</sup> This guidance is more recent than the EPA guidance cited by the SCAQMD.

The CAPCOA recommendation notes that the EPA guidance is specifically for major sources and major modifications that are subject to Prevention of Significant Deterioration (PSD) requirements and for those projects, applicants should prepare protocols for the review by the appropriate agency that meet those requirements. However, agencies in California must demonstrate compliance with the 1-hour NO<sub>2</sub> NAAQS for a variety of other regulatory programs.

Additionally, the NO<sub>2</sub>-to-NO<sub>x</sub> ratio utilized in the SCAQMD's LST methodology<sup>6</sup> was adapted from the work of Arellano et al.<sup>7</sup> As illustrated in the SCAMD's methodology, for downwind distances of 20 meters, an initial in-stack NO<sub>2</sub>/NO<sub>x</sub> ratio of 5.3 percent (0.053; see SCAQMD 2008, Table 2-4) is recommended. The ratio (10 percent) used in the LST analysis for the proposed Project is nearly twice this SCAQMD recommended ratio. As noted previously, use of an initial 10 percent ratio is commensurate with CAPCOA's recommended value and clearly more conservative than the in-stack ratio utilized in the development of SCAQMD's LST methodology. For these reasons, the in-stack ratio used is appropriate and a revision as suggested in this comment is not warranted.

Further, the March 2011, EPA guidance<sup>8</sup> addresses the applicability of ambient monitoring requirements, set forth in Appendix S in 40 CFR Part 50 in relation to the 1-hour NO<sub>2</sub> standard, to modeling applications to demonstrate compliance with the NAAQS, namely the use of 3 years of ambient monitoring data as the basis for attainment of the NAAQS using monitoring versus

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5 California Air Pollution Control Officers Association (CAPCOA) Engineering Managers, Modeling Compliance of The Federal 1-Hour NO<sub>2</sub> NAAQS, CAPCOA Guidance Document (October 27, 2011).

[http://www.valleyair.org/busind/pto/Tox\\_Resources/CAPCOANO2GuidanceDocument10-27-11.pdf](http://www.valleyair.org/busind/pto/Tox_Resources/CAPCOANO2GuidanceDocument10-27-11.pdf).

6 South Coast Air Quality Management District, Final Localized Significance Threshold Methodology (June 2003, revised July 2008), pp. 2-8 and 2-9, [http://www.aqmd.gov/ceqa/handbook/lst/Method\\_final.pdf](http://www.aqmd.gov/ceqa/handbook/lst/Method_final.pdf). *A Chemically Reactive Plume Model for the NO-NO<sub>2</sub>-O<sub>3</sub> System*.

7 Arellano et al (1990).

8 EPA (2011).

the use of 5 years of meteorological data for modeling demonstrations of compliance with the NAAQS.

The modeling completed for the proposed Project utilized the highest modeled 1-hour NO<sub>2</sub> concentration for a 5-year period for site-specific meteorological data. See **Response to Comment 3-6**.

- 3-6** The comment notes that the LST analysis for the proposed Project used the 5 years of available meteorological data to identify the calendar year that produced the highest pollutant concentration; the LST analysis states that the year 2009 data set was subsequently identified as the year producing the highest pollutant concentration. The comment notes that the meteorological data analysis does not appear in the materials provided to SCAQMD and that it should be included in the Final EIR.

The data was considered supporting documentation that could be easily replicated and was not part of the LST report. However, the data has been provided as part of this Final EIR (see **Appendix 2.0** of this Final EIR). The use of all 5 years of data would not change the analysis as the highest year 2009 data was used.



**Metro**

Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

October 25, 2013

Jesse Brown  
City of Burbank  
Planning Division  
150 North Third Street  
Burbank, CA 91502

RE: IKEA Retail Store Project Draft Environmental Impact Report

Dear Mr. Brown:

The Los Angeles County Metropolitan Transportation Authority (LACMTA) is in receipt of a Notice of Availability of a Draft Environmental Impact Report (DEIR) for the proposed IKEA retail store project at 805 S. San Fernando Road (Project No. 12-0006549). This letter conveys comments concerning issues that are germane to LACMTA's operations and facilities in relation to the proposed project.

LACMTA commented on this project after receipt of the Notice of Preparation (NOP) of the Draft Environmental Impact Report (DEIR) in February of 2013, with language regarding the State of California Congestion Management Program (CMP) statute, as well as concerns about the adjacency of the proposed project to LACMTA-owned, Metrolink-operated Right of Way (ROW). The content of that letter remains pertinent, and is expected to remain on record. In addition to the comments made at that time, LACMTA would like to add the following comments.

1

It is noted that the southern boundary of the project site is adjacent to a LACMTA-owned Railroad Right-of-Way (ROW). This ROW is used by Metrolink and Amtrak for commuter and intercity passenger rail, as well as Union Pacific Railroad freight rail. The following concerns related to the project's proximity to the ROW should be addressed:

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1. The project sponsor is advised that rail service operates in both directions and that trains may operate, in and out of revenue service, 24 hours a day, seven days a week, in the ROW adjacent to the proposed project.
2. Considering the proximity of the proposed project to the railroad ROW, these trains produce noise, vibration and visual impacts. A recorded Noise Easement Deed in favor of LACMTA is required, a form of which is attached. In addition, any noise mitigation required for the project will be borne by the developers of the project and not the LACMTA or the operating railroads.

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In addition, Metro bus lines operate on San Fernando Boulevard, adjacent to the proposed project. LACMTA is appreciative of IKEA's commitment to improving the Metro and Burbank Bus stop on the corner of Alameda and San Fernando Boulevard. This newly designed stop will be an asset to our transportation network and will make transit ridership to the proposed project more pleasant.

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In terms of bus operations during construction, LACMTA provides the following comments:

1. Although the project is not expected to result in any longterm impacts on transit, the contractor should be aware of the bus facilities and services that are present. Existing Metro bus stops must be maintained as part of the final project.
2. During construction, the stops must be maintained or relocated consistent with the needs of Metro Bus Operations. Metro Bus Operations Control Special Events Coordinator should be contacted at 213-922-4632 regarding construction activities that may impact Metro bus lines. Other municipal bus service operators may also be impacted and should be included in construction outreach efforts.

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If you have any questions regarding this response, please contact Marie Sullivan at 213-922-5667 or by email at [sullivanma@metro.net](mailto:sullivanma@metro.net).

Sincerely,



Nick Saponara  
Development Review Manager, Countywide Planning

PARCEL NO. \_\_\_\_\_  
A.P.N # . \_\_\_\_\_

RECORDING REQUESTED BY  
AND WHEN RECORDED MAIL TO:

LOS ANGELES COUNTY METROPOLITAN  
TRANSPORTATION AUTHORITY  
Real Estate Department  
Deputy Executive Officer - Real Estate  
P: 213-922-2415  
F: 213-922-2400  
One Gateway Plaza, Mail Stop 99-18-4  
Los Angeles, CA 90012-2932

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Space Above Line for Recorder's Use

[Recordation of this Public Document is Exempt from all Recording Fees and Taxes Pursuant to Government Code Section 6103]

Public Agency - No Tax Statement

**NOISE EASEMENT DEED**

For valuable consideration, receipt of which is hereby acknowledged, **(Name of Owner)**, a \_\_\_\_\_, ("Grantor") for themselves, their heirs, administrators, executors, successors, and assigns, do hereby grant, bargain, sell, and convey to the **LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY**, a public agency existing under the authority of the laws of the State of California ("Grantee"), its successors and assigns, for the use and benefit of the public and its employees, a perpetual, assignable easement in that certain real property in the City of Los Angeles, County of Los Angeles, State of California described in Exhibit "A" attached hereto and incorporated herein by this reference,

Said easement shall encompass and cover the entirety of the Grantors' Property having the same boundaries as the described Property and extending from the sub-surface upwards to the limits of the atmosphere of the earth, the right to cause in said easement area such noise, vibrations, fumes, dust, fuel particles, light, sonic disturbances, and all other effects that may be caused or may have been caused by the operation of public transit vehicles traveling along the Project right of way.

Grantor hereby waives all rights to protest, object to, make a claim or bring suit or action of any purpose, including or not limited to, property damage or personal injuries, against Grantee, its successors and assigns, for any necessary operating and maintenance activities and changes related to the Project which may conflict with Grantors' use of Grantors' property for residential and other purposes, and Grantors hereby grants an easement to the Grantee for such activities.

The granting of said Easement shall also establish the Grantors' right to further modify or develop the Property for any permitted use. However, Grantor's rights of development shall not interfere with the continued operation of Grantee's Project.

It is understood and agreed that these covenants and agreements shall be permanent, perpetual, will run with the land and that notice shall be made to and shall be binding upon all heirs, administrators, executors, successors, and assigns of the Grantor. The Grantee is hereby expressly granted the right of third party enforcement of this easement.

IN WITNESS WHEREOF, the undersigned has caused its/their signature to be affixed this day of, 2013.

By: \_\_\_\_\_  
Name

By: \_\_\_\_\_  
Name

(ATTACH NOTARY SEAL AND CERTIFICATE HERE.)

PARCEL NO. \_\_\_\_\_  
A.P. NO. \_\_\_\_\_

**ACKNOWLEDGEMENT**

State of California  
County of \_\_\_\_\_)

On \_\_\_\_\_ before me, \_\_\_\_\_  
(insert name and title of the officer)

personally appeared \_\_\_\_\_, who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to be that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/ their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature \_\_\_\_\_ (Seal)

REVISED 2/09

## CERTIFICATE OF ACCEPTANCE

This is to certify that the interest in the real property conveyed by the foregoing Noise Easement Deed from \_\_\_\_\_ to **LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY**, a public agency existing under the authority of the laws of the State of California ("LACMTA"), is hereby accepted by the undersigned on behalf of the LACMTA pursuant to authority conferred by resolution of the Board of Directors of the LACMTA, and the Grantee hereby consents to the recordation of this Deed by its duly authorized officer.

Dated this \_\_\_\_ day of \_\_\_\_\_, 20\_\_

By: \_\_\_\_\_

Deputy Executive Officer - Real Estate

**RESPONSE TO LETTER 4: Los Angeles County Metropolitan Transportation Authority, dated October 25, 2013**

- 4-1** The comment notes that the Los Angeles County Metropolitan Transportation Authority (LACMTA) commented on the Notice of Preparation (NOP) regarding the Congestion Management Plan (CMP) and the LACMTA-owned Metrolink right-of-way (ROW).

The City acknowledged the prior comments in Section 1.0, Introduction, of the Draft EIR.

The Draft EIR (Section 5.7) notes that the Southern California Regional Rail Authority (SCRRA) is a five-county Joint Powers Authority (JPA) that operates and maintains the regional commuter rail system known as Metrolink. The SCRRA maintains a railroad ROW adjacent to the Project site that includes areas that provide surface water runoff. The Draft EIR addresses the relationship of the existing rail line to the Project site and that the Project applicant would coordinate with the SCRRA to ensure that the Project adheres to applicable engineering standards.

- 4-2** The comment notes that the southern boundary of the Project site is adjacent to a LACMTA-owned railroad ROW used by Metrolink.

As discussed in **Response to Comment 4-1**, the Draft EIR discusses this existing rail line.

- 4-3** The comment notes that rail service operates in both directions on the LACMTA-owned ROW, and that trains may operate 24 hours a day, 7 days a week.

The Project applicant is aware of the ROW and track usage adjacent to the Project site.

The proposed Project has been designed to avoid any temporary impacts during construction or operation of the Project or permanent impacts to the use of the rail line. The Project will prevent flooding of the ROW and rail tracks by diverting or diffusing storm water runoff from the site so this runoff does not impact the rail line. As part of the Project best management practices (BMPs) during construction, the applicant will coordinate with the SCRRA to ensure that the storm and drainage system meets SCRRA requirements. Prior to construction, the Project applicant would coordinate with the SCRRA to ensure that the Project adheres to applicable engineering standards.

- 4-4** The comment notes that trains traveling adjacent to the Project site produce noise, vibration, and visual impacts. The LACMTA has requested that the applicant record a Noise Easement in

favor of the LACMTA acknowledging these conditions. Further, the comment notes that any noise mitigation required for the Project will be the responsibility of the Project applicant.

The Draft EIR analyzed the impacts of the Project on the existing noise environment, which includes the adjacent trains and determined that the Project does not result in significant noise impacts to train operations. The Project applicant is aware of the potential for noise and vibration from the railroad ROW to occur. The City is not requiring the applicant to record a Noise Easement because it is not required to mitigate a Project impact pursuant to CEQA. Finally, there is no mitigation necessary to reduce noise or vibration impact from the Project relative to railroad operations because these impacts were determined not to be significant, as discussed below.

With regard to potential impacts for aesthetics, the IKEA building is not oriented toward the tracks and has no windows with view of the tracks; therefore, there would not be any views of the track from within the building and there would be no impact. With regard to noise impacts, the proposed retail commercial use is not a noise- or vibration-sensitive use, and the building façade does not include windows that will face the tracks; further, the building distance from the tracks and construction will attenuate noise from the rail line. As a result, the noise level inside the building will be consistent with the City's standards and noise impacts from the rail line will not be significant.

- 4-5** The comment notes that Metro bus lines operate on S. San Fernando Boulevard adjacent to the Project site and expresses appreciation for IKEA's commitment to improving the Metro bus stop on the corner of S. San Fernando Boulevard and Alameda Avenue.

As part of the mitigation measure proposed for the intersection of S. San Fernando Boulevard and Alameda Avenue, as discussed in more detail in **Response to Comment 4-6**, the bus stop on southbound S. San Fernando Boulevard at Alameda Avenue will be relocated and improved. Additionally, as part of the Project, new bus stops will be installed for Metro Line 94 on S. San Fernando Boulevard south of the Project driveway at Elmwood Avenue. These bus stops are described in **Response to Comment 4-6**.

- 4-6** The comment correctly notes that no long-term impacts on public transit are anticipated as a result of the proposed Project. It further requests that existing Metro bus stops be maintained as part of the Project and that the contractor for the Project be made aware of existing bus facilities and services present in the area in order to avoid temporary impacts during construction.

Temporary impacts during construction are addressed further in **Response to Comment 4-7** and in the response to this comment.

Existing bus stops are located on S. San Fernando Boulevard at the intersection of Alameda Avenue for Metro Lines 94/794, 96, 183, and Glendale Beeline 7 and at the intersection of E. Providencia Avenue for Metro Line 94 (Metro Line 794 is a Rapid bus, which passes by but does not stop at E. Providencia Avenue). These stops are not adjacent to the proposed Project and will be maintained.

Proposed mitigation to the intersection of S. San Fernando Boulevard and Alameda Avenue will also maintain the existing bus stops there. However, the existing sidewalk on the west side of S. San Fernando Boulevard north of Alameda Avenue could be narrowed by approximately 2 feet (resulting in a 10-foot sidewalk) and the existing sidewalk/parkway on the east side of S. San Fernando Boulevard south of Alameda Avenue could be narrowed by approximately 3 feet (resulting in a 14-foot sidewalk/parkway) from the planted area adjacent to the sidewalk. The proposed optional acquisition of a 5-foot carve out on S. San Fernando Boulevard would provide space for a new bus shelter for the southbound passengers on S. San Fernando Boulevard, or if this area is not acquired, the existing shelter would be relocated within the narrowed sidewalk, which would remain 10-feet wide. With or without changes to the configuration of the intersection of S. San Fernando Boulevard and Alameda Avenue as traffic mitigation for the proposed Project, the bus stops at that intersection will be maintained.

New bus stops for Metro Line 94 on S. San Fernando Boulevard will be provided on both sides of S. San Fernando Boulevard near the Project driveway opposite Elmwood Avenue. These stops will be designed in coordination with the City and Metro and will provide direct transit access to the Project site. These stops will be located south of E. Elmwood Avenue on the east and west sides of S. San Fernando Boulevard. They will be designed and constructed to specifications to be set by Metro and the City of Burbank.

- 4-7** The comment requests that Metro bus stops be maintained or relocated during Project construction in accordance with the needs of Metro Bus Operations. It requests coordination and outreach with Metro Bus Operations and any other municipal bus service operators that may be affected by Project construction.

As noted in **Section 3.0** of this Final EIR, the following mitigation measure has been added to the EIR:

- 5.11-4:** Prior to the initiation of demolition and/or construction activities, the Applicant will comply with the request and alert the construction contractor of existing bus facilities and services present in the area and contact Metro Bus Operations Control Special Events Coordinator in order to avoid temporary impacts during construction.

October 23, 2013

Mr. Jesse Brown  
City of Burbank  
Planning Division  
150 North Third Street  
Burbank, CA, 91502

**DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)**  
**IKEA RETAIL STORE PROJECT**  
**CITY OF BURBANK**

**LOS ANGELES COUNTY DEPARTMENT OF PUBLIC WORKS COMMENTS**

We completed our review of the DEIR associated with the relocation of IKEA retail store from its current location (600 North San Fernando Boulevard) to a new 470,000 square-foot site in the City of Burbank. There will be two access locations to the site: the main access will be provided by the extension of First Street from East Providencia Avenue to Santa Anita Avenue; the secondary access will be provided from a signalized proposed driveway at San Fernando Boulevard and Elmwood Avenue. As part of the project, a portion of the First Street (between East Providencia Avenue and East Cedar Avenue) as well as approximately 230 feet of Cedar Avenue and portions of the alley (located behind parcels between East Providencia Avenue and East Cedar Avenue) will be vacated. The project site is currently developed with 18 office/warehouse, manufacturing, light industrial buildings, two non-conforming single-family residential units and four additional existing buildings/structures which are going to be demolished prior to project construction.

The proposed project site consists of 174,000 square feet of store area, 12,000 square feet of ancillary space, and 296,000 square feet of warehouse. Within the store area, the project proposes to include a restaurant (12,000 square foot) and an approximately 1,000-square-foot bistro selling items including, but not limited to, prepackaged frozen and dry food, hot dogs, pizza and other such items.

The Project includes 1,726 on-site parking spaces (including 70 compact parking stalls).

The following are County of Los Angeles, Department of Public Works' comments for your consideration and relate to the environmental document only:

Mr. Jesse Brown  
Oct 23, 2013  
Page 2

### **Hydrology/ Water Quality**

1. The Los Angeles County Flood Control District (LACFCD) owns and maintains Alameda Avenue-BL 0170 Drainage system (Drawing Number DDN 181-170-D1). Any impacts to LACFCD system should be discussed in the DEIR. A connection/construction permit from the LACFCD prior to construction is required for any new connection to these drains/facilities. In addition, a hydrology study and storm drain improvement plans must be submitted to the Los Angeles County Department of Public Works for review and approval prior to permit issuance. This should specifically be noted in the environmental document.

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If you have any questions regarding the Hydrology and Water Quality comment above, please contact Mr. Toan Duong of Land Development Division at (626) 458-4921 or [tduong@dpw.lacounty.gov](mailto:tduong@dpw.lacounty.gov). For submittal and permit fees associated with connections to LACFCD facilities, please contact Land Development Division, Permits Section at (626) 458-3129.

If you have any other questions or require additional information, please contact Teni Mardirosian of Land Development Division at (626) 458-4910 or [tmardirosian@dpw.lacounty.gov](mailto:tmardirosian@dpw.lacounty.gov).

TM:

\\PW01\PWPublic\ldpub\SUBPCHECK\Plan Checking Files\Zoning Permits\NonCounty Projects\Burbank IKEA Store\2013-09-23 DEIR Submittal\Burbank Ikea -DEIR.docx

**RESPONSE TO LETTER 5: Los Angeles County Department of Public Works, dated October 23, 2013**

- 5-1** The comment notes that the Los Angeles County Flood Control District (LACFCD) owns and maintains the Alameda Avenue-BL 0170 Drainage facility that is located adjacent to the site, and any impacts to the system should be addressed in the EIR. The comment further notes that a hydrology study and storm drain improvement plans must be submitted to the Los Angeles County Department of Public Works for review and approval.

The Draft EIR notes in Section 5.7, Hydrology and Water Quality, that the Project's storm drain system would need to connect to the existing LACFCD system. Proposed storm drains within the site would carry runoff to the southwest corner of the Project site, where they would join and enter into an underground storage tank. From the tank, runoff would be conveyed off site in a proposed storm drain pipe, which would run within the SCRRA railroad right-of-way towards Alameda Avenue, where it would join an existing 72-inch main line storm drain that is part of the LACDPW storm drain system. No changes to the LACDPW's Alameda Avenue Drain would be required. As requested, the Applicant will coordinate with the LACFCD and submit the Project hydrology study and storm drain improvement plans to LACFCD for review in order to obtain the permit required to connect the Project storm drain system to the County's facilities.

**From:** Chris Krohn [<mailto:ChrisKrohn@burbankusd.org>]  
**Sent:** Friday, October 25, 2013 2:53 PM  
**To:** Prescott, Patrick  
**Subject:** EIR Concerns

Mr. Prescott

My Name is Christine Krohn the Principal of Burbank Community Day School located at 223 E. Santa Anita Ave. I have some concerns about the EIR and the areas that it does not address. Please see below;

The EIR does not address, or mitigate for pedestrian safety. Under Section 5.8.1 Existing Conditions, the Burbank Community Day School is not listed as a surrounding land use. Neither are:

- The townhouses located at the northeast corner of Elmwood and S. San Fernando Road
- The disabled housing located at the southeast corner of Providencia and S. San Fernando Road
- The Burbank Senior Artist Colony at the Southeast corner of (200) E. Verdugo Avenue and S. San Fernando Boulevard
- The senior housing, Wesley Tower, at the northeast corner of (201) E. Verdugo Avenue and S. San Fernando.
- The senior housing at the northwest corner of (151) E. Verdugo and S. San Fernando Boulevard
- The proposed Hilton Garden Inn at the southwest corner of the intersection of E. Verdugo Avenue.
- The propose GrandView Suites Hotel located at the northwest corner of S. San Fernando Boulevard and Providencia Avenue

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Please address these concerns in relationship to your EIR.

**Christine Krohn, Principal**  
**Burbank Community Day School**  
**223 E. Santa Anita Ave**  
**Burbank, CA. 91502**  
**Office (818)558-4693 Fax (818)846-3404**  
**[chriskrohn@burbankusd.org](mailto:chriskrohn@burbankusd.org)**



**RESPONSE TO LETTER 6: Burbank Community Day School, dated October 25, 2013**

- 6-1** The comment states that the Draft EIR does not address pedestrian safety in the vicinity of the proposed Project. It lists a number of nearby land uses, including the Burbank Community Day School, several senior housing communities, and two proposed hotels, among others, stating that they were not listed as surrounding land uses in Section 5.8.1 of the Draft EIR.

Existing land uses around the Project site are addressed on page 5.8-2 of Section 5.8, Land Use and Planning, in the Draft EIR. This description has been expanded to include the uses identified in this comment (see **Section 3.0** of the Final EIR).

The following uses are nearby:

- Townhouses located at the northeast corner of Elmwood and S. San Fernando Boulevard
- Disabled housing located at the southeast corner of E. Providencia and S. San Fernando Boulevard
- The Burbank Senior Artist Colony located at the southeast corner of E. Verdugo Avenue and S. San Fernando Boulevard
- The Wesley Tower (senior housing) located at the northeast corner of E. Verdugo Avenue and S. San Fernando Boulevard
- Senior housing located at the northwest corner of E. Verdugo Avenue and S. San Fernando Boulevard

While not specifically listed in the Draft, these adjacent uses were considered in the analyses. The addition of these uses as part of the description does not change any of the conclusions in the Draft EIR.

Both the proposed Hilton Garden Inn, located at 401 S. San Fernando Boulevard, and the proposed Grandview Suite Hotel, located at 549 of S. San Fernando Boulevard, are not identified in the Draft EIR as existing uses as these projects have not yet been built.

The application for the proposed IKEA store was received and deemed complete prior to the adoption of *Burbank2035* General Plan. Therefore, the City's applicable rules mandate consideration of this Project under the goals and policies of the City's previous General Plan. Nonetheless, the roadway improvements proposed to mitigate traffic impacts at the S. San

Fernando Boulevard and Alameda Avenue intersection are consistent with the Goals and Policies of *Burbank2035* General Plan.

The portion of S. San Fernando Boulevard located south of Verdugo Avenue is classified as a Secondary Arterial by the *Burbank2035* General Plan. North of Verdugo Avenue, S. San Fernando Boulevard is designated as a downtown collector. The Project site and all but two of the uses identified above are located south of Verdugo Avenue on the portion of S. San Fernando Boulevard designated as a secondary arterial. According to the *Burbank2035* General Plan, secondary arterials are streets that serve local cross-town traffic and may also serve regional traffic. Pedestrian connections on secondary arterials are designed to encourage multimodal trips (commercial vehicles, passenger vehicles, pedestrians, bicycles, etc.), unlike north of Verdugo Avenue, S. San Fernando Boulevard, which is classified as a downtown collector, where creating and maintaining a pedestrian environment is a higher priority.

The existing 7-foot sidewalk on S. San Fernando Boulevard along the Project's direct street frontage would be widened to 15 feet as part of the Project, providing an improved environment for pedestrians consistent with the *Burbank2035* General Plan sidewalk width standards and policy guidelines for secondary arterials. Further, the Project would provide landscaped buffer areas on S. San Fernando Boulevard both north and south of the proposed Project driveway at E. Elmwood Avenue. These improvements, which are shown on the Project site plan in Figure 3.0-5 in the Draft EIR, will encourage pedestrian activity and enhance walkability and pedestrian safety on S. San Fernando by providing a third signalized pedestrian crossing across San Fernando between Verdugo Avenue and Alameda Avenue thereby reducing the distance between signalized crossings. As previously noted in **Response to Comment 4-6**, new bus stops for Metro Line 94 on S. San Fernando Boulevard will be provided on both sides of the street near the Project driveway at Elmwood Avenue.

In addition, the existing signalized intersections along S. San Fernando Boulevard, including Verdugo Avenue and E. Providencia Avenue, provide pedestrian crosswalks at all legs of the intersection. These crosswalks are activated by push buttons and provide actuated walk/don't-walk signs for pedestrians. Handicap-accessible curb cutouts are provided on each corner. The new traffic signal proposed on S. San Fernando Boulevard at the Project driveway at E. Elmwood Avenue will provide an additional all-way crosswalk, designed to the latest City and industry standards. This additional crosswalk will further enhance pedestrian access and safety on S. San Fernando Boulevard by providing a third signalized pedestrian crossing across S. San Fernando between Verdugo Avenue and Alameda Avenue, thereby reducing the distance between signalized crossings. It also should be noted that, as a result of the proposed access on S. San

Fernando, there will be fewer curb cuts and driveways as the Project will replace several driveways with a single access point.

Finally, as part of the Project, new bus stops will be installed for Metro Line 94 on S. San Fernando Boulevard on both sides of the street near the Project driveway at Elmwood Avenue. These stops will be designed in coordination with the City and Metro and will provide direct transit access to the Project site, encouraging transit as an alternative mode to driving to IKEA.

The proposed enhancements including the widened sidewalk, landscaped buffer areas, and new pedestrian crosswalk on S. San Fernando Boulevard at E. Elmwood Avenue are features of the proposed Project rather than mitigation measures. The Project will not result in a significant impact to pedestrian safety along S. San Fernando Boulevard. In addition, the primary entrance will be on E. Providencia Avenue from the proposed extension of First Street. Because First Street will provide the most convenient access to the Project site, most Project traffic will not use S. San Fernando Boulevard. Most Project traffic that does travel on S. San Fernando Boulevard would be traveling to and from Alameda Avenue to the south and would also not pass the nearby land uses identified in the comment.



Jesse Brown  
City of Burbank  
150 N. Third Street  
Burbank, CA 91502

Re: IKEA Retail Store Project  
  
SCH Number - 2013011049

Dear Mr. Brown,

The undersigned represents Citizens Advocating Rational Development ("CARD"), a non-profit corporation dedicated to issues in development and growth.

This letter contains comments on the Draft Environmental Impact Report on the IKEA Retail Store Project, in accordance with CEQA and the Notice of Completion and Availability. Please ensure that these comments are made a part of the public record.

#### ENERGY

The DEIR does not discuss any requirements that the Project adopt energy saving techniques and fixtures, nor is there any discussion of potential solar energy facilities which could be located on the roofs of the Project. Under current building standards and codes which all jurisdictions have been advised to adopt, discussions of these energy uses are critical; the construction of a new 470,000 sf IKEA retail store with 1,726 parking spaces, will devour copious quantities of electrical energy, as well as other forms of energy.

## WATER SUPPLY

The EIR ( or DEIR – the terms are used interchangeably herein) does not adequately address the issue of water supply, which in California, is a historical environmental problem of major proportions.

What the DEIR fails to do is:

1. Document wholesale water supplies;
2. Document Project demand;
3. Determine reasonably foreseeable development scenarios, both near-term and long-term;
4. Determine the water demands necessary to serve both near-term and long-term development and project build-out.
5. Identify likely near-term and long-term water supply sources and, if necessary, alternative sources;
7. Identify the likely yields of future water from the identified sources;
8. Determine cumulative demands on the water supply system;
9. Compare both near-term and long-term demand to near-term and long-term supply options, to determine water supply sufficiency;
10. Identify the environmental impacts of developing future sources of water; and
11. Identify mitigation measures for any significant environmental impacts of developing future water supplies.
12. Discuss the effect of global warming on water supplies.

There is virtually no information in the DEIR which permits the reader to draw reasonable conclusions regarding the impact of the Project on water supply, either existing or in the future.

For the foregoing reasons, this EIR is fatally flawed.

### AIR QUALITY/GREENHOUSE EMISSIONS/CLIMATE CHANGE

The EIR lacks sufficient data to either establish the extent of the problem which local emissions contribute to deteriorating air quality, greenhouse emissions or the closely related problem of global warming and climate change, despite the fact that these issues are at the forefront of scientific review due to the catastrophic effects they will have on human life, agriculture, industry, sea level risings, and the many other serious consequences of global warming.

This portion of the EIR fails for the following reasons:

1. The DEIR does not provide any support or evidence that the Guidelines utilized in the analysis are in fact supported by substantial evidence. References to the work of others is inadequate unless the document explains in sufficient detail the manner and methodology utilized by others.
2. Climate change is known to affect rainfall and snow pack, which in turn can have substantial effects on river flows and ground water recharge. The impact thereof on the project's projected source of water is not discussed in an acceptable manner. Instead of giving greenhouse emissions and global warming issues the short shrift that it does, the EIR needs to include a comprehensive discussion of possible impacts of the emissions from this project.
3. Climate change is known to affect the frequency and or severity of air quality problems, which is not discussed adequately.
4. The cumulative effect of this project taken with other projects in the same geographical area on water supply, air quality and climate change is virtually missing from the document and the EIR is totally deficient in this regard.

For the foregoing reasons, the EIR is fatally flawed.

### ALTERNATIVE ANALYSIS

The alternative analysis fails in that the entire alternatives-to-the-project section provides no discussion of the effects of the project, or the absence of the project, on surrounding land uses, and the likely increase in development that will accompany the completion of the project, nor does it discuss the deleterious effects of failing to update the project upon those same surrounding properties and the land uses which may or have occurred thereon.

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Thank you for the opportunity to address these factors as they pertain to the referenced DEIR.

Very truly yours,

CITIZENS ADVOCATING RATIONAL DEVELOPMENT

NICK R. Green

President

**RESPONSE TO LETTER 7: Citizens Advocating Rational Development, not dated**

**7-1** The comment states that the Draft EIR does not discuss any requirements for the Project to adopt energy-saving techniques and fixtures, nor does it contain a discussion of potential solar facilities.

The Project Description in the Draft EIR (see Section 3.4, Project Characteristics) describes a number of Project features that will reduce energy and provide for solar use. These include:

- Solar photovoltaic electricity for building. As it does atop the existing IKEA store in Burbank, IKEA plans to include an array of solar panels on the roof located between rooftop equipment and skylights. The final solar array will be a building-specific design likely consisting of a 1,200-kW system capable of producing approximately 1,750,000 Wh of electricity annually. The system will result in reducing the equivalent of at least 1,235 tons of CO<sub>2</sub> (this would be equal to eliminating the emissions of 257 cars or powering 185 homes yearly).<sup>9</sup>
- The Project site includes a location for clean energy fuel cells that can run on natural gas as well as renewable fuels such as biogas.
- Light-emitting diode (LED) site lighting and some of the building signage.
- LED spotlights in sales areas.
- Building management system to control heating, ventilation, and air conditioning (HVAC) and lighting.
- Skylights in warehouse to use natural light for illumination.
- Solar tracking skylights to maximize daylight in select areas.
- Only compact fluorescent bulbs available for sale in the store.
- Rechargeable forklifts.

Further, as discussed in Section 5.5, Greenhouse Gas, of the Draft EIR, the Project will be required to comply with *Burbank2035* General Plan's GHG reduction policies, the Sustainability Action Plan, the Green Building Code, and the Greenhouse Gas Reduction Plan (GGRP), which are all designed to reduce GHG emissions programmatically for the City.

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9 Clean energy equivalents are based on EPA's energy resources calculator: <http://www.epa.gov/cleanenergy/energy-resources/calculator.html>.

The consistency of the Project with each of the mandatory and voluntary measures in the GGRP is discussed in the Draft EIR in Table 5.5-3, Applicable GGRP Measures and Project Consistency. It should be noted that only those measures that would be applicable to the proposed Project are presented.

The Project incorporates all mandatory and voluntary GHG reduction measures that are applicable to the Project. There are a total of 14 voluntary measures with which the Project will be consistent. These measures and features are consistent with existing recommendations to reduce GHG emissions. The Project is consistent with the City's GGRP and goals and targets for total GHG emissions reductions. Therefore, the Project's GHG impacts are not considered in relation to the SCAQMD Tier 2 threshold of significance and there would be no significant impacts related to the consistency with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs.

- 7-2** The comment states that the EIR does not include a discussion of the City's water supplies and demand, nor does it evaluate the Project's requirements. The comment further states that there is no discussion of future water sources and cumulative demands on the water system. Finally, the comment states that there is no discussion of global warming on water supplies.

The Draft EIR Section 5.12 includes a detailed discussion of the City's water supplies. The Draft EIR notes that the City of Burbank is supplied by the Burbank Water and Power (BWP) Water Division, which provides potable water, water for fire protection purposes, and recycled water to more than 26,000 service connections within the City. BWP received 44 percent of its potable water from Metropolitan supplies during the 2010 calendar year. Burbank has five potable water connections to the Metropolitan system, with a maximum rated capacity of 115 cubic feet per second (51,610 gallons per minute). BWP's water supplies are supplemented locally from groundwater wells drawing from the San Fernando Groundwater Basin, which accounts for the remaining 56 percent of the City's water supply. In 2010, BWP used approximately 7,852 acre-feet of treated water from the Metropolitan system and supplemented its potable supply with an additional 9,917 acre-feet from groundwater supplies. In addition, BWP is required to purchase additional untreated water supplies from the Metropolitan system to replenish local groundwater supplies. The Draft EIR (see Section 5.12) notes that the BWP 2010 Urban Water Management Plan (UWMP) concludes that there will be sufficient water supplies to meet demand through 2035 in normal and dry years due to existing contracts with wholesale supplier Metropolitan.

Further, the Draft EIR includes by reference the City's 2010 UWMP<sup>10</sup> that was prepared as required by the California Urban Water Management Planning Act. Pursuant to these regulatory requirements, the UWMP includes evaluations of expected water supplies and demands, and of the reliability of the supplies and descriptions of water conservation and water management activities, including water recycling and preparation for water shortages.

California Urban Water Management Planning Act, *Water Code* Sections 10610 through 10657 requires urban water suppliers to assess the reliability of its water sources over a 20-year planning horizon every 5 years through the preparation of an UWMP. Preparation of an UWMP is required for Burbank since it provides over 3,000 acre-feet of water annually. The UWMP must include:

- An assessment of past and future water supplies and demands
- An evaluation of the future reliability of Burbank's water supplies
- Information regarding water conservation and water management activities
- A discussion of water recycling activities
- Contingency planning for water shortages

The City's 2010 UWMP satisfies all of these requirements.

Finally, the 2010 UWMP notes that Metropolitan discusses regional water supply reliability in its Regional Urban Water Management Plan (RUWMP; November 2010). The RUWMP uses information from the 2010 Integrated Water Resources Plan Update (October 2010), the 1999 Water Surplus and Drought Management (WSDM) Plan, and other Metropolitan planning studies. To develop average year supply and demand estimates, the Metropolitan used the historic hydrology for 1922 through 2004. For dry year planning, Metropolitan used the historic 1-year (1977) and 3-year (1990–1992) dry periods on the State Water Project (SWP) because "it is Metropolitan's largest and most variable supply." Metropolitan works to have access to a "diverse water portfolio" with alternatives that allow it to meet demands even in years when the primary supplies would not be enough. Part of the plan is to have water storage capacity to draw on when supplies are short. They use an "adaptive management" approach to better respond to uncertainty. Metropolitan concludes that it can meet 100% of full-service demands

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10 Burbank Water and Power, Water Division, *2010 Urban Water Management Plan*, (Burbank, California: June 2011).

through 2030. As stated the Draft EIR, Project demands for water can be adequately met by the City and Metropolitan.

- 7-3** The comment states that the EIR lacks an analysis of localized emissions that could contribute to deteriorating air quality, GHG emissions, or global warming and climate change.

The Draft EIR Section 5.2, Air Quality, includes a detailed analysis of air quality impacts and Section 5.5, Greenhouse Gas includes a detailed evaluation of GHG impacts.

A project-specific LST analysis was prepared for the proposed Project and is provided in the Draft EIR Section 5.2 and also in Appendix 5.2. The technical approach and dispersion modeling methodologies used in the preparation of the LST analysis were composed of all relevant and appropriate procedures presented by the EPA, the California Environmental Protection Agency (CalEPA), and SCAQMD. The methodologies and assumptions offered under this regulatory guidance were used to ensure that the analysis effectively quantified exposures to sensitive receptors associated with the generation of pollutant emissions from on-site construction activity.

As noted in Table 5.2-9 in the Draft EIR, PM<sub>10</sub> and particulate matter less than 2.5 microns (PM<sub>2.5</sub>) maximum concentrations of 8.72 and 4.44 micrograms/m<sup>3</sup> were predicted. These values do not exceed SCAQMD's significance threshold of 10.4 micrograms/m<sup>3</sup>, and impacts are less than significant. Further, the Project will be required to comply with SCAQMD Rule 403, excessive fugitive dust emissions shall be controlled by regular watering or other dust prevention measures. In addition, SCAQMD Rule 403 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off site.

Further, as discussed in Section 5.5, Greenhouse Gas, of the Draft EIR, the Project will be required to comply with *Burbank2035* General Plan's GHG reduction policies, the Sustainability Action Plan, the Green Building Code, and the Greenhouse Gas Reduction Plan, which are all designed to reduce GHG emissions programmatically for the City.

The consistency of the Project with each of the mandatory and voluntary measures in the GGRP is discussed in the Draft EIR in Table 5.5-3, Applicable GGRP Measures and Project Consistency. It should be noted that only those measures that would be applicable to the proposed Project are presented.

The Project incorporates all mandatory and voluntary GHG reduction measures that are applicable to the Project. There are a total of 14 voluntary measures with which the Project will

be consistent. These measures and features are consistent with existing recommendations to reduce GHG emissions. The Project is consistent with the City's GGRP and goals and targets for total GHG emissions reductions. Therefore, the Project would meet the SCAQMD Tier 2 threshold approach and there would be no significant impacts related to the consistency with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs.

- 7-4** The comment states that the alternative analysis provides no discussion of the effects of the Project or the absence of the Project on surrounding land uses and the likely increase in development that will accompany the completion of the Project.

Impacts of the Project are discussed in the various topical sections contained in Section 5.0, Consideration and Discussion of Environmental Impacts. The environmental issues considered in the EIR and their corresponding section numbers are as follows:

5.1 Aesthetics	5.7 Hydrology and Water Quality
5.2 Air Quality	5.8 Land Use and Planning
5.3 Cultural Resources	5.9 Noise
5.4 Geology and Soils	5.10 Public Services
5.5 Greenhouse Gas	5.11 Transportation and Traffic
5.6 Hazards and Hazardous Materials	5.12 Utilities and Service Systems

The Draft EIR Section 6.0, Alternatives, includes a comparison of the impacts of the proposed Project and the alternatives selected for further evaluation are provided in this section for each of the environmental topics addressed in the EIR. This comparison of impacts assumes, for each topic, that the mitigation measures identified in this EIR for the proposed Project would also be incorporated into the alternatives.

In accordance with the *State CEQA Guidelines* Section 15126.6(d) the discussion of the environmental effects of the alternatives in an EIR may be less detailed than provided for in the proposed Project but should be sufficiently detailed to allow meaningful evaluation, analysis, and comparison with the proposed Project. The following were identified for evaluation:

- Alternative 1: No Project – No Development Alternative
- Alternative 2: No Project – Development Under the Existing General Plan Designation
- Alternative 3: Smaller Store Alternative (25 Percent Reduction)
- Alternative 4: No First Street Extension Alternative

Each of the alternatives was evaluated for the same topics noted previously for the proposed Project.

Evaluation of the No Project alternative is required by the *State CEQA Guidelines*. Specifically, the *State CEQA Guidelines* state that when the project consists of a development project, the No Project alternative should consider the circumstance where the project does not proceed.

The No Project Alternative is the circumstance under which the Project does not proceed and the property remains in its existing condition. Under this alternative, the new IKEA store would not be built on the proposed Project site and the existing store in Burbank would remain in operation. Alternative 1 would result in greater impacts related to GHGs, land use, and storm water as part of hydrology and water quality, and utilities/service systems than the proposed Project.

GHG impacts would be greater in that the existing uses on site would not assist the City in reducing GHG emissions as outlined in the City GGRP. Additionally, vehicle trips associated with the existing site and from IKEA store at 600 N. San Fernando Boulevard would continue to contribute to mobile GHG emissions. Drainage improvements to provide for relief to existing storm water runoff concerns would not be implemented. Land use impacts are also considered to be greater as redevelopment of the site as called for in the Burbank Center Plan would not occur.

Alternative 1 would result in similar aesthetics and air quality during operation as the existing uses and the existing IKEA store would continue to generate trips that would contribute to emissions, hazards and hazardous materials impacts, and public services. Air quality during construction, cultural resources, geology and soils, noise, transportation/traffic, and utilities (water and wastewater) impacts would be reduced in comparison to the proposed Project.

Finally, the Draft EIR Section 7.4, Growth-Inducing Effect, addresses the ways in which the proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. A project has the potential to foster economic or population growth in a geographic area if it meets any of the following criteria:

- Removal of an impediment to growth (e.g., the establishment of an essential public service or the provision of new access to an area)
- Economic expansion or growth occurring in an area in response to a project (e.g., changes in revenue base, employment expansion)

- Establishment of a precedent-setting action (e.g., a change in zoning or general plan designation)

An evaluation of this Project against these three criteria is provided Draft EIR. The *State CEQA Guidelines* also state that it must not be assumed that growth is necessarily beneficial, detrimental, or of little significance to the environment.



James Chuang  
Environmental Specialist/Land Planner

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Fax: 323.518.2324  
E-mail: WCChuang@semprautilities.com

October 17, 2013

Jesse Brown, Senior Planner  
City of Burbank, Planning Division  
150 North Third Street  
Burbank, CA 91502

Re: **IKEA Retail Store Project SCH 2103011049**

Dear Mr. Brown:

Southern California Gas Company (SoCalGas) appreciates the opportunity to review and respond to the Project's Draft Environmental Impact Report. We respectfully request that the following comments be incorporated in the subsequent Final Environmental Impact Report (FEIR).

SoCalGas recommends that the FEIR include a discussion of activities associated with the potential relocation natural gas service lines within the project site. At present, there is no mention of any existing facilities that would have to be relocated. This additional discussion should include:

- The presence and condition of existing utility infrastructure on the project site, including right-of-ways and/or easements.
- The number and description of any new natural gas facilities that will have to be constructed or installed, in order to provide natural gas service to the proposed project.
- Identification of any existing natural gas infrastructure that would need to be relocated and/or abandoned, in order to provide natural gas service to the proposed project.
- Identification and description of any temporary areas required for construction and/or staging of material related to new gas service relocation or construction.
- Identification of any actions that would require permitting or acquisition of new right-of-way or easements for natural gas service to the project.

In addition, if any field monitoring for cultural or biological resources is required during construction of the natural gas facilities, the monitoring should be mentioned in the FEIR as a requirement and responsibility of the ("larger") **IKEA Retail Store Project SCH 2103011049**. Likewise, any environmental mitigation required for the potential impacts associated with the construction of gas service to the project should also be addressed as part of the responsibility of the "larger" **IKEA Retail Store Project SCH 2103011049**.

Once again, we appreciate the opportunity to comment on the DEIR. If you have any questions, please feel free to contact me at (213) 244-5817 or [WCChuang@semprautilities.com](mailto:WCChuang@semprautilities.com).

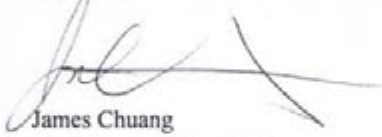
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Page 2 of 2

Please contact our Non-Residential Construction at 1-800-427-2000 to begin the process of potential relocation.

Sincerely,

A handwritten signature in dark ink, appearing to read 'James Chuang', with a long horizontal stroke extending to the right.

James Chuang  
Environmental Specialist  
Southern California Gas Company

**RESPONSE TO LETTER 8: Southern California Gas Company, dated October 17, 2013**

- 8-1** The comment recommends that the Final EIR include a discussion of activities associated with the potential relocation of natural gas service lines within the Project site.

As noted in the Draft EIR (Section 5.1.2), the proposed Project was reviewed for consistency with adopted plans, policies, and design guidelines with respect to utilities and service systems as set forth by the City of Burbank.

The Project applicant will consult with Southern California Gas Company regarding any necessary relocation, abandonment, or new natural gas service. It is currently contemplated that the following would occur:

- i. Services pipe to/on the existing project site will be disconnected and services from Cedar Avenue removed.
- ii. Gas main in Cedar Avenue will be cut back as necessary to clear Cedar Avenue improvements, as well as site proposed improvements.
- iii. Gas main extending from San Fernando Blvd. at Elmwood, towards the site will be cut back for entry improvements.
- iv. Gas service to feed IKEA will be from the San Fernando Blvd. and Elmwood Avenue location extending on-site as required (should service be requested).

Compliance with all applicable requirements will ensure that potential Project impacts on natural gas delivery facilities will be less than significant.

- 8-2** The comment notes that if any field monitoring for cultural or biological resources is required during construction of the natural gas facilities, such monitoring should be noted in the Final EIR.

The Draft EIR (see Section 7.1, Effects Found Not to Be Significant) notes that no native biological resources exist on the Project site; it was used for commercial, manufacturing, and industrial uses in the past. The site is disturbed and has some vegetated ground cover as landscaping or in vacant areas. As such, no monitoring to avoid impacts to biological resources is required or would occur should natural gas lines need to be relocated or removed.

The proposed Project also is not expected to impact any cultural resources (see Section 5.3, Cultural Resources, of the Draft EIR). However, the Draft EIR does identify mitigation measures (see **Mitigation Measures 5.3-1, 5.3-2, and 5.3-3**) should any cultural resources be discovered during construction activities. All responsibility for monitoring activities that may result from these mitigation measures will be the responsibility of the Applicant.

October 28, 2013

Sustainable Burbank Commission

Patrick Prescott, AICP  
Deputy City Planner  
City of Burbank  
[PPrescott@burbankca.gov](mailto:PPrescott@burbankca.gov)

Dear Mr. Prescott:

The Sustainable Burbank Commission is aware of the potential positive benefits of the proposed IKEA store at 805 S. San Fernando Boulevard, Burbank 91502, however, the Commission believes that many impacts are not adequately mitigated. Additionally, the proposed IKEA EIR and the proposed mitigations, or lack thereof, are in conflict with Burbank2035: General Plan; the South San Fernando Subarea of the Burbank Center Plan; and General Plan guidelines, Assembly Bill (AB) 1358, The Complete Streets Act of 2008.

1

Additionally, "CEQA requires that an EIR contain an assessment of the cumulative impacts that could be associated with the proposed Project. As defined in the State *CEQA Guidelines*, 'Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.' Although project-related impacts may be individually minor, the cumulative effects of these impacts, in combination with the impacts of other projects, could be significant under CEQA and must be addressed. Through the evaluation of cumulative impacts, CEQA attempts to ensure that large-scale environmental impacts will not be ignored." (from Section 4.3 Cumulative Scenario of the Environmental Setting of the EIR)

2

It is our opinion that through a process of omission the EIR ignores the aforementioned Cumulative Scenario.

Under Section 5.8.1 Existing Conditions subsection Surrounding Land Uses; the following land uses are not listed and are a significant omission from the EIR analysis:

- The townhouses located at the northeast corner of Elmwood and S. San Fernando Road
- The Burbank Community Day School

3

- The disabled housing located at the southeast corner of Providencia and S. San Fernando Road
- The Burbank Senior Artist Colony at the Southeast corner of (200) E. Verdugo Avenue and S. San Fernando Boulevard
- The senior housing, Wesley Tower, at the northeast corner of (201) E. Verdugo Avenue and S. San Fernando.
- The senior housing at the northwest corner of (151) E. Verdugo and S. San Fernando Boulevard
- The proposed Hilton Garden Inn at the southwest corner of the intersection of E. Verdugo Avenue.
- The propose GrandView Suites Hotel located at the northwest corner of S. San Fernando Boulevard and Providencia Avenue

3

This section of the EIR fails to note the linkage of the S. San Fernando corridor to the City Center with its high density residential uses, multitude of restaurants, shopping and entertainment venues and the significant pedestrian activity that is encouraged and generated through the area by the existing uses, proposed uses and those uses that will be generated by the guidance set forth in Burbank2035: General Plan; and the Burbank Center Plan. **The study fails to note the Media Center Mall as the north anchor and the proposed IKEA, and existing Ralph's, CVS, Trader Joes, and Walgreens as the southern anchor. This section and other sections fail to note the elderly, disabled, youth and other pedestrian activity and bicycle circulation that have been encouraged and generated along the corridor.**

4

The EIR offers no mitigation for pedestrians at the S. San Fernando/Verdugo Avenue intersection and the S. San Fernando/Alameda intersection, or any other intersection in between. **In fact Mitigation Option 1 and Mitigation Option 2 for Intersection 28- S. San Fernando and Alameda Avenue involve reducing sidewalk width.**

5

- Pedestrian safety and circulation are not addressed.
- Safety of the disabled is not addressed.
- Bicyclist circulation and safety are not addressed.
- The EIR offers no mitigation to enhance pedestrian, disabled, and bicyclist circulations and safety in the area.
- The EIR offers no mitigation plans for the Verdugo Avenue/ S. San Fernando Boulevard

6

intersection to provide for pedestrian safety.

- The EIR offers no mitigation plans for the Providencia/ S. San Fernando Boulevard intersection to provide for pedestrian safety.
- The EIR offers no mitigation plans for the S. San Fernando Boulevard/Alameda Avenue intersection to provide for pedestrian safety.
- The EIR offers no mitigation plans for the S. San Fernando Boulevard/Elmwood Avenue intersection to provide for pedestrian safety.
- Secondary access to the site: signalized driveway at S. San Fernando Boulevard and Elmwood Avenue and the existing driveway south of Elmwood Avenue does not address pedestrian circulation and safety.
- Large truck ingress and egress to and from the dock area located on the S. San Fernando side of the building and is proposed to be accessed from S. San Fernando Boulevard via Elmwood Avenue is inconsistent with the pedestrian orientation of the area, and the surrounding land uses: senior housing communities, disabled housing, Bud Ovrom Park, and the Burbank Community Day School.
- The proposed parking lot is not adequately mitigated for the heat island effect.
- The proposed parking lot is not adequately designed for pedestrian access to the main entrance. There is no safe passage across the parking lot.

6

7

Thank you very much.

Very truly yours,

*James Smith*

James Smith

Vice Chair, Sustainable Burbank Commission

**RESPONSE TO LETTER 9: Sustainable Burbank Commission, dated October 28, 2013**

- 9-1** The comment recognizes the potential positive benefits of the Project but also notes that some impacts of the Project are not adequately mitigated and, additionally, that some of the proposed mitigation may be inconsistent with the City of Burbank General Plan and associated guidelines.

The application for the proposed IKEA store was received and deemed complete prior to the adoption of *Burbank2035* General Plan. Therefore, the City's applicable rules mandate consideration of this Project under the goals and policies of the City's previous General Plan. Nonetheless, the roadway improvements proposed to mitigate traffic impacts at the S. San Fernando Boulevard and Alameda Avenue intersection are consistent with the Goals and Policies of *Burbank2035* General Plan.

The *Burbank2035* General Plan Final EIR identified a potential significant cumulative traffic impact at S. San Fernando Boulevard and Alameda Avenue, and considered an intersection widening improvement to mitigate this impact. However, the *Burbank2035* General Plan Final EIR ultimately determined that the proposed improvement would conflict with important goals and policies of the *Burbank2035* General Plan. This determination was made by applying the "policy-based screening" analysis process described in the *Burbank2035* General Plan EIR Transportation Analysis Report (provided below with this response see **Table 2.0-2, IKEA Project Intersection Mitigations – Burbank2035 Policy-Based Screening Analysis**).<sup>11</sup> Because of this conflict, the proposed improvement was removed as a mitigation measure, and the *Burbank2035* General Plan assumed that a deficient level of service would remain at this location.

When the traffic analysis for the proposed IKEA store identified a Project impact at this same location, the mitigation measures previously identified in the *Burbank2035* General Plan Final EIR, as well as other mitigation measures, were evaluated for appropriateness at this location. The IKEA traffic study concluded that an improvement different than the one identified in the *Burbank2035* General Plan Final EIR could mitigate the impact of the Project at this intersection. This new mitigation measure also responded to concerns raised during the City's EIR scoping/community meeting about the existing vehicular operating conditions at this intersection. To determine whether this mitigation measure was compatible with the *Burbank2035* General Plan, City staff tested it against the goals and policies of the *Burbank2035*

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11 Final Transportation Analysis Report, *Burbank2035* General Plan (July 2012), page 43–45.

General Plan using the same “policy-based screening” process. This process involves evaluating the proposed intersection improvement to determine if it would conflict with important land use or mobility policy categories related to ROW, Scale and Design, Complete Streets, and Pedestrian Opportunities. Specifically, if a proposed improvement to an intersection to mitigate traffic impacts conflicts with the ROW policies or two or more of the Scale and Design, Complete Streets, or Pedestrian Opportunities policies, then an exemption to the City’s desired level of service (LOS) D standard for intersections is granted and the improvement is not implemented.

The results of this screening for both mitigation measures proposed for the Project are shown in **Table 2.0-2**, which shows that both mitigation measures are compatible with the *Burbank2035* General Plan because these improvements would not conflict with the ROW policy, which states that additional ROWs for intersection improvements should be avoided, and the improvements do not conflict with two or more of the other policies. The proposed improvements at the intersection of Flower Street and Alameda Avenue would not conflict with any of these land use and mobility policies, and the improvements proposed at intersection of S. San Fernando Boulevard and Alameda Avenue would only conflict with the Complete Streets policy as the street ROWs would be widened at the intersection in a manner that increases the traveled way width at the expense of providing expanded bicycle or pedestrian facilities to accommodate non-motorized travel modes.

Therefore, the Project is consistent with the applicable General Plan goals and policies as well as with the *Burbank2035* General Plan.

Table 2.0-2 - IKEA Project Intersection Mitigations - Burbank2035 Policy-Based Screening Analysis

Intersection			Peak Hour	2016 Future Conditions						Physical Mitigation Conflicts with General Plan Policies				Conflicts with ROW or 2 Policies
				without Project		with Project				Right-of-way <sup>a</sup> (6 ft min. sidewalk)	Scale & Design <sup>b</sup>	Complete Streets <sup>c</sup>	Pedestrian Opportunities <sup>d</sup>	
No.	N/S Street	E/W Street		V/C	LOS	V/C	LOS		Change					Impact
27	Flower Street	Alameda Avenue	Weekday	0.921	E	0.937	E	0.016	YES	NO	NO	NO	NO	NO
			Weekend	0.695	B	0.743	C	0.048						
28	S. San Fernando Boulevard	Alameda Avenue	Weekday	0.843	D	0.879	D	0.036	YES	NO	NO	YES	NO*	NO
			Weekend	0.789	C	0.939	E	0.150						

## Notes:

Burbank2035 provides the City with a framework to determine if intersection improvements are infeasible due to right-of-way constraints or conflict with community values.

- [a] Right-of-Way needs: A policy conflict is triggered if any ROW acquisition is needed to implement the proposed mitigation, assuming lane width minimums and 6-foot sidewalks. Supporting Policies: Mobility Element (Policy 1.2): Recognize that Burbank is a built-out city and wholesale changes to street rights-of-way (ROW) are infeasible; and Mobility Element (Policy 3.4): All street improvements should be implemented within the existing right-of-way. Consider street widening and right-of-way acquisition as a method of last resort.
- [b] Scale & Design: A policy conflict is triggered if the scale and design goes beyond the Maximum Acceptable Mitigations 'template' identified in the Burbank2035 FEIR, or if the mitigation needed increases the existing travel-way width (measured from curb-to-curb) along a "residential/mixed use" area. Supporting Policies: Mobility Element (Policy 1.5): Design transportation improvements to be compatible with the scale and design of existing infrastructure.
- [c] Complete Streets: A conflict is triggered if the mitigation increases the travel-way width along the intersection so as to narrow existing sidewalks, decrease bike lanes widths, or greatly disturb transit/bus stop locations. Supporting Policies: Mobility Element (Policy 3.2): Complete city street by providing facilities for all transportation modes and Land Use Element (Policy 4.1): Maintain complete streets that create functional place meeting the needs of pedestrians, bicyclists, wheelchair users, equestrian, and motorists.
- [d] Pedestrian Opportunities: A conflict is triggered if the proposed mitigation requires sidewalks to go below the minimum sidewalk width standards specified in Table M-2 of the Mobility Element. Supporting Policies: Mobility Element (Policy 3.3): Provide attractive, safe street designs that improve transit, bicycle, pedestrian, and equestrian connections between homes and other destinations; and Mobility Element (Policy 5.5): Require new development to provide land necessary to accommodate pedestrian infrastructure, including sidewalks at the standard widths specified in Table M-2; and Land Use Element (Policy 4.5): Require pedestrian-oriented areas include amenities such as sidewalks of adequate width, benches, street trees and landscaping, decorative paving, art, kiosks, and restrooms.

\* Improvements maintain sidewalk widths at a minimum 10 feet, except for a small street segment on the south side of Alameda Avenue, where sidewalks are narrowed less than 10 feet for a small segment. However, this narrowed sidewalk is consistent with adjoining sidewalk widths and is compatible with the land uses immediately adjacent to the narrowed area.

- 9-2** The comment claims that the Draft EIR does not analyze cumulative impacts as required by the CEQA.

The *State CEQA Guidelines* Section 15130 states that “an EIR shall discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable.” The *State CEQA Guidelines* state that the necessary elements for an adequate discussion of significant cumulative impacts include either:

- (A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency.
- (B) A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include a general plan, regional transportation plan, or plans for the reduction of GHG emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program.

The Draft EIR considers the effects of the proposed Project in relation to the *Burbank2035* General Plan build out and other developments either proposed, approved, or under construction in the area, and expected to be implemented prior to the build-out date of the Project. The *Burbank2035* General Plan establishes policies that would guide future development/redevelopment within the City and implementation measures that are long term in nature. Additionally, the Draft EIR includes consideration of specific projects (Related Projects) in the area of the proposed Project. Information about Related Projects was obtained from the cities of Burbank, Glendale, and Los Angeles. A total of 17 related projects were identified in relation to the proposed Project based on their proximity to the Project site. Table 4.0-1, Related Projects, in the Draft EIR provides information on the land use, location, size, and status of these Related Projects. Use of the Related Projects was used to assess cumulative conditions where appropriate (e.g. air quality emissions, traffic, utilities).

For the purposes of the traffic study and this EIR, the City of Burbank Travel Demand Forecasting Model (Burbank TDF Model) was used to assess cumulative traffic. A discussion of the cumulative impacts related to traffic is provided in Section 5.11.4.2, Cumulative Impact Analysis.

- 9-3** The comment claims that various land uses were omitted from Section 5.8.1 of the Draft EIR, including the Burbank Community Day School, several senior housing communities, and two proposed hotels, among others.

See **Response to Comment 6-1**. The addition of these land uses does not change any of the conclusions in the analysis of the Draft EIR.

Existing land uses around the Project site are addressed on page 5.8-2 of Section 5.8, Land Use and Planning, in the Draft EIR. As shown, all of these additional land uses are located north of the Project site along S. San Fernando Boulevard, except for the townhouses located directly across S. San Fernando Boulevard from the proposed Project driveway at E. Elmwood Avenue. The Draft EIR analyzed sensitive uses in closer proximity to the Project site than the additional uses mentioned by the commenter. Therefore, impacts analyzed for the sensitive use closest to the Project site represent a conservative estimate of potential impacts; any sensitive uses located further away would experience relatively fewer impacts and conclusions would not change.

- 9-4** The comment states that the Draft EIR does not note that S. San Fernando Boulevard links the City Center to the north with the various retail uses to the south, including the proposed Project, Ralphs, CVS, Trader Joe's, and Walgreens. It claims that there is a lot of pedestrian and bicycle activity along the corridor, including by youth, elderly, and disabled persons, and that this activity may be increased by the guidance set forth in the City of Burbank General Plan.

The portion of S. San Fernando Boulevard located south of Verdugo Avenue is classified as a secondary arterial by the *Burbank2035* General Plan. North of Verdugo Avenue, S. San Fernando Boulevard is designated as a downtown collector. The Project site and related Projects uses are shown in Figure 4.0-5, Location of Related Projects of the Draft EIR. The Project and all but two of the uses noted in the comment are located south of Verdugo Avenue on the portion of S. San Fernando Boulevard designated as a secondary arterial. According to the *Burbank2035* General Plan, secondary arterials are streets that serve local cross-town traffic and may also serve regional traffic. Pedestrian connections on secondary arterials are designed to encourage multimodal trips (commercial vehicles, passenger vehicles, pedestrians, bicycles, etc.), unlike north of Verdugo Avenue, S. San Fernando Boulevard is classified as a downtown collector, where creating and maintaining a pedestrian environment is a higher priority.

The existing 7-foot sidewalk on S. San Fernando Boulevard along the Project's direct street frontage would be widened to 15 feet as part of the Project, providing an improved environment for pedestrians and consistent with the *Burbank2035* General Plan sidewalk width standards and policy guidelines for secondary arterials. Further, the Project would provide landscaped buffer areas on S. San Fernando Boulevard both north and south of the proposed Project driveway at E. Elmwood Avenue. These improvements, which are shown on the Project

Site Plan in Figure 3.0-5 in the Draft EIR, will encourage pedestrian activity and enhance walkability and pedestrian safety on S. San Fernando Boulevard by providing a third signalized pedestrian crossing across San Fernando between Verdugo Avenue and Alameda Avenue thereby reducing the distance between signalized crossings.

In addition, the existing signalized intersections along S. San Fernando Boulevard, including Verdugo Avenue and E. Providencia Avenue, provide pedestrian crosswalks at all legs of the intersection. These crosswalks are activated by push buttons and provide actuated walk/don't-walk signs for pedestrians. Handicap-accessible curb cutouts are provided on each corner. The new traffic signal proposed on S. San Fernando Boulevard at the Project driveway at E. Elmwood Avenue will provide an additional all-way crosswalk, designed to the latest City and industry standards. This additional crosswalk will further enhance pedestrian access and safety on S. San Fernando Boulevard by providing a third signalized pedestrian crossing across San Fernando between Verdugo Avenue and Alameda Avenue, thereby reducing the distance between signalized crossings.

- 9-5** The comment notes that the EIR does not provide mitigation for pedestrian activity at intersections along S. San Fernando Boulevard from Verdugo Avenue to Alameda Avenue. It further notes that proposed mitigation at the intersection of S. San Fernando Boulevard and Alameda Avenue would result in reducing sidewalk widths.

S. San Fernando Boulevard is classified as a secondary arterial by the *Burbank2035* General Plan south of Verdugo Avenue, including adjacent to the Project site. According to the *Burbank2035* General Plan, secondary arterials may serve regional traffic and commercial uses. North of Verdugo Avenue, S. San Fernando Boulevard is classified as a downtown collector, where walkability is a top priority. South of Verdugo Avenue, however, while walkability is an important consideration for a secondary arterial, it is also intended to carry significant amounts of automobile traffic, including commercial vehicles and trucks.

Under existing conditions, there are many pedestrian features and benefits. There are sidewalks and street trees along S. San Fernando Boulevard from Verdugo Avenue to Alameda Avenue (and beyond in each direction). Pedestrian crosswalks and actuated pedestrian walk/don't walk indicators are provided on all four legs of the intersections at Verdugo Avenue, E. Providencia Avenue, and Alameda Avenue. Handicap accessible curb cutouts are provided on each corner of these intersections. Ovrom Park and Community Center is located west of S. San Fernando Boulevard between E. Providencia Avenue and E. Cedar Avenue.

There are also traffic-calming measures in keeping with the goals of the *Burbank2035* General Plan for secondary arterials, including a landscaped median along the center of S. San Fernando Boulevard, street trees, and on-street parking to buffer pedestrians from automobile traffic. The speed limit is set at 35 miles per hour (mph), consistent with the standard for a secondary arterial. While lower design speeds are allowed under this street classification, the importance of S. San Fernando Boulevard for auto mobility required that the speed limit remain at 35 mph.

The comment is correct that no mitigation is offered for pedestrians along S. San Fernando Boulevard. This is because no significant impacts with regard to pedestrian accessibility or safety were identified in the Draft EIR, and thus no mitigation is necessary.

The Project does include several design features that will enhance the pedestrian experience and increase pedestrian safety along the Project site's frontage on S. San Fernando Boulevard. Adjacent to Project frontage on S. San Fernando Boulevard, the existing 7-foot sidewalk would be widened to 15 feet, consistent with the *Burbank2035* General Plan guidelines for secondary arterials. The Project would also provide landscaped buffer areas on S. San Fernando Boulevard both north and south of the proposed Project driveway at E. Elmwood Avenue.

In addition, the implementation of a new traffic signal on S. San Fernando Boulevard at the Project driveway at E. Elmwood Avenue will include new controlled crosswalks across S. San Fernando Boulevard as well as across E. Elmwood Avenue and the Project driveway. The existing pedestrian crosswalks at E. Providencia Avenue and at Alameda Avenue are approximately 1,500 feet apart, more than one-quarter mile. The new pedestrian crosswalks at E. Elmwood Avenue will halve the distance between successive crosswalks on S. San Fernando Boulevard. They will be designed to the latest City and industry standards. These improvements, which are shown on the Project site plan in Figure 3.0-5 of the Draft EIR, will encourage pedestrian activity and enhance walkability and safety in the vicinity of the Project site.

It is also important to note that the proposed Project is not expected to add significant levels of traffic on S. San Fernando Boulevard between Verdugo Avenue and the Project access point across from E. Elmwood Avenue. As shown in Figure 5.11-5, Project-Only Peak Hour Traffic Volumes, in the Draft EIR, the Project is anticipated to add approximately 4 trips to this stretch during the weekday afternoon peak hour and approximately 15 trips during the weekend midday peak hour. This is due to the fact that the primary entrance to the proposed Project will be via the First Street Extension, and therefore, it is anticipated that much of Project traffic will avoid this section of S. San Fernando Boulevard altogether. It should also be noted that as a

result of the proposed access on S. San Fernando, there will be fewer curb cuts and driveways than currently exist as the Project will replace several driveways with a single access point.

The Project would increase traffic on S. San Fernando Boulevard south of the Project site, as this is a more direct route for traffic heading in a southern direction and Alameda Avenue provides additional access to I-5. However, the incremental increase of Project traffic to this intersection, which already experiences high traffic volumes (i.e., S. San Fernando Boulevard and Alameda Avenue), would not result in a significant impact to pedestrians.

Further, the proposed mitigation has the potential to improve intersection operating conditions (measured by LOS) to levels better than what is projected in the Future Without Project (Year 2016) Conditions analysis. Three potential mitigation options (**Mitigation Measures 5.11-1, 5.11-2 and 5.11-3**) were evaluated to mitigate Project impacts at the intersection of S. San Fernando Boulevard and Alameda Avenue.

Under Option 1, the eastbound approach of the intersection would be modified to add a second left-turn lane. Under Option 2, the southbound approach of the intersection would be widened to add an exclusive right-turn lane. Under Option 3, both the eastbound second left-turn lane of Option 1 and the southbound exclusive right-turn lane of Option 2 would be implemented in tandem. As shown in Table 5.11-18, Existing (Year 2012) Plus Project With Mitigation Intersection Peak Hour Levels of Service, and Table 5.11-19, Future (Year 2016) Plus Project With Mitigation, in the Draft EIR Section 5.11, Option 1 would result in a modest improvement over intersection operating conditions without the proposed Project during the weekday afternoon peak hour, and a slight worsening over intersection operating conditions without the proposed Project during the weekend midday peak hour. Overall, implementation of Option 1 would result in a substantially unchanged operating condition as compared to conditions without the proposed Project. Option 1 would also result in the full mitigation of the identified Project impact at the intersection of S. San Fernando Boulevard and Alameda Avenue during both analyzed peak hours under both Existing With Project (Year 2012) Conditions and Future With Project (Year 2016) Conditions.

Option 2 would result in only modest benefits to intersection operating conditions during either the weekday afternoon or weekend midday peak hours. With implementation of Option 2, the intersection of S. San Fernando Boulevard and Alameda Avenue would remain impacted during both the weekday afternoon and weekend midday peak hours under both Existing With Project (Year 2012) Conditions and Future With Project (Year 2016) Conditions.

Option 3, like Option 1, would result in the full mitigation of the identified Project impact at the intersection of S. San Fernando Boulevard and Alameda Avenue during both analyzed peak hours under both Existing With Project (Year 2012) Conditions and Future With Project (Year 2016) Conditions. It would also result in additional improvements to intersection operating conditions over what was identified with implementation of Option 1. With implementation of Option 3, the improvement in net operating conditions during the weekday afternoon peak hour compared to Future without Project (Year 2016) Conditions would be greater than with implementation of Option 1. In addition, during the weekend midday peak hour, intersection operating conditions would be substantially unchanged compared to conditions without the proposed Project, and even slightly improved under Future With Project (Year 2016) Conditions. Option 3 would provide substantial benefits to vehicular traffic through the intersection during both peak periods and nonpeak periods.

While Mitigation Option 1 would reduce impacts to less than significant, the City is recommending Mitigation Option 3 as it would both reduce impacts to less than significant and improve circulation in the immediate area.

In summary, while the Project would add traffic to the intersections on Alameda Avenue, which are already congested, the mitigation measures proposed in the Transportation Study would result in substantially unchanged intersection operating conditions at those locations, and even improvement in some cases.

The comment correctly notes that the proposed mitigations for the intersection of S. San Fernando Boulevard and Alameda Avenue would require modest narrowing of existing sidewalks; Options 1 and 3 would require narrowing the sidewalk on the south side of Alameda Avenue west of S. San Fernando Boulevard from 10 feet to 6 feet. It is worth noting that the existing sidewalk on the south side of Alameda Avenue further west of the San Fernando Intersection is already 6-feet wide, so this alteration merely matches what exists further west along the corridor. Further, the land uses on the south side of Alameda Avenue in this area are industrial or motorist-serving commercial (gas station), which can be accommodated by narrower sidewalk widths. Options 2 and 3 would require narrowing the sidewalk on the west side of S. San Fernando Boulevard north of Alameda Avenue from 12 feet to 10 feet and narrowing the sidewalk/parkway on the east side of S. San Fernando Boulevard south of Alameda Avenue from 17 feet to 14 feet. The amount of sidewalk width reductions proposed as part of these mitigation options would result in sidewalk widths that are still within the 10-foot minimum widths prescribed in *Burbank2035*, and all existing bus stops would be maintained. As

such, no pedestrian impacts would result as secondary impacts of these proposed mitigation options and no pedestrian mitigations are required. See also **Response to Comment 9-1**.

- 9-6** The comment recaps points made in earlier comments, including that pedestrian and bicycle circulation and safety are not addressed in the EIR, safety for disabled persons is not addressed, and that no mitigation measures to address pedestrian safety were provided along S. San Fernando Boulevard between Verdugo Avenue and Alameda Avenue. It additionally claims that the two proposed Project site driveways on S. San Fernando Boulevard do not address pedestrian circulation and safety.

As described in **Response to Comment 9-4**, the proposed Project would not result in significant impacts to bicyclists, the elderly, or disabled. Therefore, no mitigation measures are necessary. See also **Response to Comment 9-4**.

As described in **Response to Comment 9-5**, the proposed Project would also not result in significant impacts to pedestrians along S. San Fernando Boulevard. There are abundant pedestrian facilities and safety measures, including sidewalks, street trees, controlled crosswalks, and street parking to separate automobile traffic from pedestrians, along S. San Fernando Boulevard. Additionally, the proposed Project would widen sidewalks along Project site frontage from 7 feet to 15 feet and would implement landscaped buffer areas along S. San Fernando Boulevard.

Additionally, along with signaling the intersection of S. San Fernando Boulevard and E. Elmwood Avenue, the Project would provide new controlled crosswalks at this location, adding a new safe pedestrian crossing point along S. San Fernando Boulevard. The existing pedestrian crosswalks at E. Providencia Avenue and at Alameda Avenue are approximately 1,500 feet apart, more than one quarter mile. The new pedestrian crosswalks at E. Elmwood Avenue will halve the distance between successive crosswalks on S. San Fernando Boulevard.

The Project will comply with the Americans with Disabilities Act (ADA) for new construction resulting from the adoption of revised 2010 Standards in the final rules for Title II (28 CFR part 35) and Title III (28 CFR part 36). All pedestrian improvements in public ROW also would be designed to be ADA compliant.

- 9-7** The comment claims that delivery truck traffic to the Project site on S. San Fernando Boulevard is inconsistent with the pedestrian orientation of the area and surrounding land uses. It also claims that the parking lot is not adequately mitigated for the heat island effect and that no safe pedestrian passage is provided across the parking lot to the main entrance.

The comment incorrectly implies that truck traffic to and from the proposed Project's loading dock would need to use S. San Fernando Boulevard to access the Project site. In fact, as the Project site plan in Figure 3.0-5 of the Draft EIR shows, in addition to access to S. San Fernando Boulevard, home delivery trucks can circumnavigate the Project site and use the driveway on E. Providencia Avenue adjacent to S. Bonnywood Place. Therefore, the site plan allows delivery trucks to bypass S. San Fernando Boulevard if necessary. Since the IKEA distribution center, which will supply this store with merchandise, is located in the Tejon Ranch Industrial Park on I-5 approximately 70 miles north of the Project site, the vast majority of delivery truck traffic will be travelling to and from the Project site from that direction. For convenience, these trucks will likely use the Alameda Avenue exit.

Even if the Project's merchandise delivery trucks use S. San Fernando Boulevard, the Project is anticipated to have up to 9 daily delivery trucks on a weekday and 12 daily delivery trucks on a weekend. The addition of these to and from the Project site—all during off-peak night-time or early morning hours—would have little effect on the neighborhood to be disruptive. The Project applicant is unique among retailers in being able to control the time and reduced number of truck deliveries. The applicant will restrict truck deliveries, as necessary, to minimize impacts to the neighboring properties.

Further, and most importantly, the primary current use on the Project site is Western Studio Service, which is a film equipment storage and transportation facility. Trucks of all sizes—including full 18-wheelers of the type that deliver merchandise to IKEA stores—travel to and from Western Studio Service at all hours of the day and night. The primary entrance to this facility is through the secondary driveway to the Project site on S. San Fernando Boulevard (i.e., the driveway referred to in the comment). Removal of Western Studio Service from this site, even after completion of the Project and the beginning of associated merchandise delivery, will result in a net decrease in truck traffic on S. San Fernando Boulevard. It should also be noted that as a result of the proposed access on S. San Fernando, there will be fewer curb cuts and driveways than currently exist as the Project will replace several driveways with a single access point.

This comment is not correct in stating there is no safe pedestrian passage across the parking lot to the main entrance to the store. As shown in the Project site plan (Figure 3.0-5), there are direct pedestrian sidewalks and crosswalks leading from both pedestrian-oriented Project driveways (i.e., the primary entrance on E. Providencia Avenue at First Street and the signalized driveway on S. San Fernando Boulevard across from E. Elmwood Avenue). From each entrance, the pedestrian crosswalks across the internal vehicular circulation roadways are located in areas

of high visibility away from internal intersections or congestion points. Further, the pedestrian crosswalks will be well marked and signed for both pedestrians and drivers.

The urban heat island (UHI) effect occurs when developed areas have significantly higher average temperatures than the areas surrounding them. The UHI, defined as the rise in temperature of any manmade area, results in a well-defined, distinct "warm island" among the "cool sea" represented by the lower temperature of the area's nearby natural landscape. There is little or no likelihood of the proposed Project resulting in a heat island as the Project site is currently developed and includes substantial paved areas that could generate increased temperature. Further, the Project will not increase any paved area, and includes a total of approximately 85,600 square feet or 1.96 acres of landscaped areas, not including street setbacks. This will assist in reducing any potential increase in heat that may occur and ensure a less than significant impact.

Patrick Prescott, AICP  
Deputy City Planner  
City of Burbank  
[PPrescott@burbankca.gov](mailto:PPrescott@burbankca.gov)

Monday, October 28, 2013

Dear Mr. Prescott:

The IKEA store proposed for 805 S. San Fernando Boulevard, Burbank 91502 is an exciting opportunity for the City of Burbank. However, after having visited the proposed location, and reviewed plans and the EIR, I have some questions and concerns to which I would appreciate answers. It is rare that a municipality finds itself in the position that Burbank is in, whereby major portals to the city are being developed at the same time. The North San Fernando development project and this enormous project are situated as bookends on the same major city street, and thus offer up an opportunity for unified urban design that should not be ignored or let go.

I want to be sure that this development does as much for the City of Burbank and its residents as the City is – it seems – prepared to do for it. In addition, I want to ensure that the IKEA EIR and its proposed mitigations are in keeping with the already codified following pieces of legislation:

Burbank2035: General Plan

South San Fernando Subarea of the Burbank Center Plan

General Plan guidelines, Assembly Bill (AB) 1358, The California Complete Streets Act of 2008

1

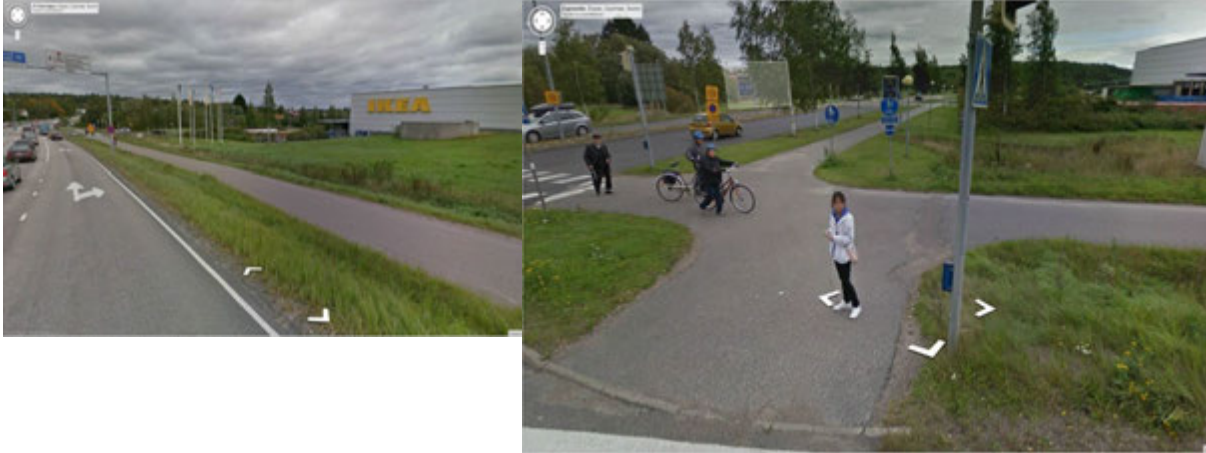
Please advise what is being done by IKEA to ensure that:

- a) Ample accommodations are being made for pedestrians visiting the store. This should include, but not be limited to: pedestrian crosswalks on S. San Fernando Boulevard, at various points by the store property; bus stops on both sides of the street in front of the store on S. San Fernando Boulevard; dedicated pedestrian entrance to the property at the bottom of Cedar Lane, with a pedestrian crosswalk(s) leading to the main store entrance.

2



- b) Ample accommodations are being made for bicyclists visiting or passing by the store. This should include, but not be limited to: ample bicycle parking facilities at the bottom of Cedar Lane, for visitors to the store choosing to come by bicycle; and bicycle lanes (not sharrows or other “half measures”) on San Fernando Boulevard (hundreds of other IKEA stores worldwide provide admirable accommodations for pedestrians and bicyclists. Indeed, in some countries they provide free bus service!). Bicycle parking in the garage is all well and good, but only if residents and others are able to safely travel TO the store, in the first place.



3

- c) Delivery truck entrance and exit should NOT be on San Fernando Boulevard, but instead via the Northwest corner of the property, at the west end of Providencia Avenue. This would require a small adjustment to the plan, in order to allow said trucks to move around the back of the store and reach the loading zone as shown on the currently proposed plan, but it would ensure that San Fernando traffic and accident challenges were properly mitigated, as well as ensure that delivery traffic, with all its attendant challenges, was not blended with customer traffic, both vehicular and otherwise.
- d) Pedestrian movement around the peripheries of the store property is protected and enhanced. This should incorporate, but not be limited to: bulb-outs along the west side of S. San Fernando at Providencia Avenue and Cedar Lane; widened sidewalks along the whole block, a larger pocket park than proposed adjacent to S. San Fernando entrance (easily achievable once truck access is no longer at San Fernando Boulevard).
- e) The Parking area for customers on the property should (1) provide sufficient spaces, which is currently not the case, (2) provide ample and sufficient shade coverage so as not to contribute unnecessarily to Urban Heat Island Effect, smog buildup, and other health hazards, and (3) provide appropriate rainwater conservation, and ground percolation measures. It is worth noting that 1,700 parking spaces for the nation's largest IKEA store is less than many other smaller IKEA stores.

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While I have other concerns, in addition to the aforementioned 5 issues, I am most eager to hear the city's and IKEA's response to these particular concerns, and how IKEA plans to demonstrate its world-renowned commitment to sustainable development, community-building, and responsible corporate stewardship.

Thank you very much.

Sincerely,

Nicholas de Wolff  
Burbank Resident

**RESPONSE TO LETTER 10: Mr. Nicholas de Wolff, dated October 28, 2013**

- 10-1** The comment requests that the proposed Project and its mitigation measures be in accordance with the City of Burbank General Plan and associated guidelines.

See **Response to Comment 9-1**.

- 10-2** The comment requests that pedestrian circulation to the proposed Project be addressed, including pedestrian crosswalks on S. San Fernando Boulevard and on the store property, bus stops on S. San Fernando Boulevard at the Project driveway, and provision of a dedicated pedestrian entrance from E. Cedar Avenue.

Pedestrian access to and comfort on the Project site are addressed by the design of the Project. The Project driveway on S. San Fernando Boulevard at E. Elmwood Avenue will be signalized as part of the Project. With signalization, pedestrian crosswalks and walk/don't walk indicators will be installed at all four legs of the intersection. These new crosswalks will provide a critical east–west crossing of S. San Fernando Boulevard midway between E. Providencia Avenue and Alameda Avenue, where the next nearest crosswalks are located.

Additionally, bus stops for Metro Line 94 on S. San Fernando Boulevard will be provided on both sides of the street near this driveway. These stops will be designed in coordination with the City and Metro and will provide direct transit access to the Project site.

As shown in the Project site plan in Figure 3.0-5 of the Draft EIR, there is a dedicated pedestrian sidewalk leading from E. Cedar Avenue into the Project site. Crosswalks within the Project site lead to the store entrance. Pedestrians also have sidewalk and crosswalk access to the store entrance from the primary driveway at First Street and E. Providencia Avenue and the new signalized driveway on S. San Fernando Boulevard. Further, there are no significant impacts related to pedestrian safety. See also **Response to Comment 9-7**.

- 10-3** The comment requests that bicycle circulation to the proposed Project be addressed, including bicycle parking facilities on E. Cedar Avenue and bicycle lanes on S. San Fernando Boulevard.

As with pedestrian access, bicycle access is addressed by the design of the proposed Project. While the bicycle parking space requirement based on the City's Transportation Demand Management program for the proposed Project would require 13 on-site bicycle parking spaces, the Project will install 86 bicycle parking spaces—one for every 20 automobile parking spaces—which would comply with proposed new regulations in the City that have not yet been approved. These parking spaces would be provided closer to the store entrance than the west

end of E. Cedar Avenue and thus more convenient for patrons traveling to the Project site by bicycle.

Additionally, as part of the design of the First Street Extension between Santa Anita Avenue and E. Providencia Avenue, curbside bicycle lanes would be provided as an extension of planned bicycle lanes on First Street as identified in the City of Burbank Bicycle Master Plan. These lanes will lead directly to the primary Project driveway at the end of First Street at E. Providencia Avenue. While the Applicant would support implementation of dedicated bicycle lanes on S. San Fernando Boulevard, the street is not wide enough to accommodate bicycle lanes without eliminating the on-street parking, which serves adjacent businesses, residences, and community uses. Notwithstanding, the Project would not have a significant impact relative to bicycle circulation and parking.

- 10-4** The comment suggests that delivery trucks should not enter and exit on S. San Fernando Boulevard but in the westernmost corner of the Project site to E. Providencia Avenue. The comment expresses concern for the potential of accidents on S. San Fernando Boulevard and the mixing of customer traffic with delivery traffic.

As the Project site plan shown in Figure 3.0-5 of the Draft EIR shows, in addition to access to S. San Fernando Boulevard, merchandise delivery trucks can circumnavigate the Project site and use the driveway on E. Providencia Avenue adjacent to S. Bonnywood Place as suggested in the comment. Therefore, the site plan allows delivery trucks to bypass S. San Fernando Boulevard if necessary.

The IKEA distribution center, which will supply this store with merchandise, is located in the Tejon Ranch Industrial Park on I-5 approximately 70 miles north of the Project site. The vast majority of delivery truck traffic will be travelling to and from the Project site from that direction. For convenience, these trucks will likely use the Alameda Avenue exit.

As Table 5.11-5, Project Trip Generation, in Section 5.11 of the Draft EIR shows, the proposed Project is anticipated to have up to 9 daily delivery trucks on a weekday and 12 daily delivery trucks on a weekend. These trucks, whether using S. San Fernando Boulevard or the secondary driveway on E. Providencia Avenue, will not travel during times that customers would be on the Project site, and therefore will not pose a safety hazard to customers.

Further, the existing uses on the Project site, including Western Studio Service, generate truck activity on an irregular schedule throughout the day and night, including during peak hours of auto and pedestrian activity. Trucks to and from Western Studio Service use S. San Fernando

Boulevard almost exclusively. Construction of the proposed Project will remove this and other existing uses from the Project site, and ultimately will likely lead to a net reduction in truck traffic in the area rather than an increase. Therefore, there will not be any new safety hazard on S. San Fernando Boulevard as a result of Project construction.

- 10-5** The comment requests that pedestrian facilities adjacent to the Project site be protected and enhanced with bulb-outs on S. San Fernando Boulevard at E. Providencia Avenue and E. Cedar Avenue, widened sidewalks, and an increase in size to the proposed landscaped area on S. San Fernando Boulevard.

Along the Project frontage, the existing sidewalk will be widened from 7 feet to 15 feet, which is the standard width for secondary arterials located within the South San Fernando Commercial area under the *Burbank2035* General Plan. The Applicant can only widen sidewalks into property it controls; the Applicant does not own or control the right of way or frontage anywhere but along the Project site, which fronts approximately 335 feet of S. San Fernando Boulevard.

The intersection of S. San Fernando Boulevard and Cedar and E. Cedar Avenue is not signalized and is not striped with a pedestrian crosswalk across S. San Fernando Boulevard. The installation of bulb-outs at this location would result in a narrower crossing width for pedestrians. However, the City would prefer to encourage pedestrian crossings at the signalized crosswalks on San Fernando Boulevard. With the implementation of the proposed Project, a new signalized crossing location will be provided at the Project driveway across from Elmwood Avenue, approximately 325 south of the east leg of E. Cedar Avenue. There are already signalized crosswalks at Verdugo Avenue, E. Providencia Avenue (approximately 225 feet north of the west leg of E. Cedar Avenue) and at Alameda Avenue. With the new signal at Elmwood Avenue, every other cross-street from Verdugo Avenue to Alameda Avenue will provide a signalized crosswalk, providing good pedestrian connectivity across S. San Fernando Boulevard. These signalized crosswalks will be safer than an unsignalized crossing point at E. Cedar Avenue, whether or not bulb-outs are installed. Therefore, bulb-outs at E. Cedar Avenue on S. San Fernando Boulevard are unnecessary given the close proximity to the existing signalized crosswalk at E. Providencia Avenue and the proposed signalized crosswalk at the Project driveway.

Further, the requested bulb-outs are not required to mitigate any significant impact, as discussed previously in **Response to Comment 10-2**.

The landscaped areas adjacent to the signalized Project driveway on S. San Fernando Boulevard are as large as they can be given the constraints. The secondary Project access point on S. San

Fernando Boulevard, south of the signalized driveway, would not only serve IKEA delivery trucks (as described in **Response to Comment 10-4**) but also would provide necessary access to the adjacent commercial property to the south. An access easement was granted to that property and must be maintained, and therefore that access point cannot be removed to expand the proposed landscaped area. Further, the depth of the landscaped area cannot be increased as the loading area must be large enough to allow the delivery trucks to maneuver on the Project site.

The Project mitigates all identified traffic impacts to below a level of significance with the proposed mitigation program, and therefore no additional mitigation is necessary.

- 10-6** The comment suggests that sufficient parking would not be provided on the Project site. It also requests that the parking lots should be shaded to reduce the heat island effect and that rainwater conservation measures should be implemented. The comment claims that many smaller IKEA stores around the country provide more than 1,700 parking spaces.

As proposed, the Project includes sufficient parking and shade trees in the parking areas to reduce the heat island effect. As noted in **Response to Comment 9-7**, the urban heat island (UHI) effect occurs when developed areas have significantly higher average temperatures than the areas surrounding them. The UHI, defined as the rise in temperature of any manmade area, results in a well-defined, distinct "warm island" among the "cool sea" represented by the lower temperature of the area's nearby natural landscape. There is little or no likelihood of the proposed Project resulting in a heat island as the Project site is currently developed and includes substantial paved areas that could generate increased temperature. Further, the Project will not increase any paved area, and includes a total of approximately 85,600 square feet or 1.96 acres of landscaped areas, not including street setbacks. This will assist in reducing any potential increase in heat that may occur.

The *City of Burbank Municipal Code* requires 3.3 parking spaces per 1,000 square feet of gross floor area for retail uses. The proposed Project would be 470,000 square feet, and requires a total of 1,551 parking spaces to meet the *Municipal Code*. The Project proposes to provide 1,726 parking spaces, 175 more than required under the *Municipal Code*. It should be noted that approximately 70 of the total spaces provided would be compact spaces; however, the Project would still provide 105 full size spaces in excess of the *Municipal Code* requirement.

Further, the Project would provide 86 bicycle parking spaces (73 spaces in excess of the current bicycle parking requirements and consistent with proposed future requirements) and easy

pedestrian access. The Project would also include provision of a new stop for Metro Line 94 on S. San Fernando Boulevard adjacent to the Project site, providing direct transit access to the Project site. Encouraging the use of alternative travel modes will help to reduce overall parking demand.

*Parking Generation, 4th Edition* (Institute of Transportation Engineers [ITE], 2010) identifies a peak parking demand for furniture stores on a Saturday of 1.34 spaces per 1,000 square feet, approximately 40 percent of the *Municipal Code* requirement, and only 36 percent of the 1,726 spaces proposed to be provided for the Project.

**From:** Ken Lewis [Ken.Lewis@acmartin.com]  
**Sent:** Sunday, October 13, 2013 6:01 PM  
**To:** [SpringGardn@juno.com](mailto:SpringGardn@juno.com); Brown, Jesse  
**Subject:** Comment on Ikea EIR

Dear Mr. Brown,

I have been reviewing the Ikea EIR. I disagree with the the following finding of the EIR:

"7.1.8 LAND USE AND PLANNING

Threshold: Physically divide an established community.

The Project site is located in the S. San Fernando Commercial subarea as defined in the Burbank Center Plan (BCP), a specific plan adopted to facilitate the revitalization of Downtown Burbank, South San Fernando, and surrounding areas. Commercial corridors, such as S. San Fernando Boulevard, are lined with commercial uses and connect downtown Burbank to the neighboring City of Glendale. Construction of the proposed Project would modify the existing complex of industrial, commercial, and general office uses on the site with the new proposed retail commercial store and related site improvements. The proposed Project would not cause a physical division of existing neighborhoods in the area, and the physical arrangement of the established community will not be changed by the proposed Project.  
Impacts would be less than significant. "

I disagree with this finding for the following reason;

The finding ignores the site plan layout which places access to the loading dock for the project on S. San Fernando Boulevard. The site plan does not show an alternative to accessing the loading dock for other than S. San Fernando Blvd. The site plan is clearly laid out only for loading dock access from S. San Fernando Blvd. Already described as the largest Ikea in the world, this project will bring significant eighteen wheel truck traffic onto S. San Fernando Boulevard. The aforementioned truck traffic will disrupt and divide the established community.

The established community described elsewhere in the EIR is one of high density housing with retail on the first floor. S. San Fernando Blvd. is developing as a pedestrian friendly environment. It is very important to note that Senior housing and the City's community center are on S. San Fernando Blvd. and with a few hundred yards of the proposed project's loading dock. The project's loading dock and the resultant heavy truck traffic are not compatible with the community's character and will certainly divide the north and south sides of the community.

The site plan needs to be revised to prevent loading dock ingress and egress from S. San Fernando Blvd.

Sincerely,  
Ken Lewis, AIA  
past Chair Burbank Sustainable Commission

**From:** Ken Lewis [Ken.Lewis@acmartin.com]  
**Sent:** Sunday, October 13, 2013 6:11 PM  
**To:** Brown, Jesse  
**Subject:** Question on Ikea EIR

Dear Mr. Brown,

In reading section 7.1.10, Noise, only questions regarding Airport noise are asked. Are their CEQA questions regarding traffic noise on residential communities? You can probably guess where this is going, what about the impact of heavy 18 wheel truck traffic on S. San Fernando Blvd. residents? The new noise condition will be significantly different from the existing condition for the residents as well as the anticipated future high density housing to be developed on S. San Fernando Blvd. - not to mention the anticipated cafe's etcetera.

2

Sincerely,

Ken Lewis, AIA  
Past Chair Burbank Sustainable Commission

**From:** Ken Lewis [Ken.Lewis@acmartin.com]  
**Sent:** Sunday, October 13, 2013 6:36 PM  
**To:** Brown, Jesse  
**Cc:** [SpringGardn@juno.com](mailto:SpringGardn@juno.com)  
**Subject:** Comment on Ikea EIR

Dear Mr. Brown,

Section 7.1.14 Transportation and Traffic fails to acknowledge the impact of the addition of heavy 18 wheel truck traffic to S. San Fernando Blvd. The current condition is a four lane small vehicle roadway that narrows to two lanes one block west of the project site. Large vehicle are seldom seen on the Blvd. The addition of significant numbers of heavy trucks needs to be addressed in the EIR. Are these trucks included in the traffic modeling? They will have impacts on intersection LOS projections. The surrounding intersections have significant pedestrian traffic due to proximity to Metro, Downtown Burbank, Senior Housing, high density housing and the Burbank Community Center. Large trucks making right turns or uncontrolled left turns (no left turn arrow) cannot clear intersection nearly as quickly as small vehicles when pedestrians are present in the cross walks. The aforementioned will make the LOS of the surrounding intersections worse. These items are not discussed in the EIR and as such are a serious omission.

Sincerely,

Ken Lewis, AIA  
Past Chair Burbank Sustainable Commission

**From:** Ken Lewis [Ken.Lewis@acmartin.com]  
**Sent:** Sunday, October 13, 2013 6:51 PM  
**To:** Brown, Jesse  
**Cc:** [SpringGardn@juno.com](mailto:SpringGardn@juno.com)  
**Subject:** Comment on Ikea EIR

Dear Mr. Brown,

I would like to comment on Ikea EIR, Section 7.2 Significant Unavoidable Impacts, Transportation/Traffic:

The EIR acknowledges the project loading dock access from S. San Fernando Blvd., but does not address the impact of this access. The impact is the addition of significant quantities of heavy eighteen wheel tractor trailers to S. San Fernando Blvd. The writer believes that these heavy vehicles will have significant environmental impacts on the established community, vehicular traffic and pedestrian circulation. All of the aforementioned impacts could be eliminated if the site plan were configured differently. An alternative configuration that used 1st St. for loading dock access would entirely eliminate the environmental impacts described above.

Sincerely,

Ken Lewis, AIA  
Past Chair Burbank Sustainable Commission

**RESPONSE TO LETTER 11: Mr. Ken Lewis, dated October 13, 2013**

- 11-1** The comment contends that heavy truck traffic to and from the Project site on S. San Fernando Boulevard will result in division of an established community and a significant impact.

The proposed Project design provides full circulation for trucks and, for this reason, will not concentrate truck traffic on S. San Fernando Boulevard. As shown on the Project site plan, Figure 3.0-5 of the Draft EIR, in addition to access to S. San Fernando Boulevard, home delivery trucks can travel around the proposed Project and use the driveway on E. Providencia Avenue adjacent to S. Bonnywood Place. Therefore, the site plan allows home delivery trucks to bypass S. San Fernando Boulevard if necessary.

The IKEA distribution center, which will supply this store with merchandise, is located in the Tejon Ranch Industrial Park on I-5 approximately 70 miles north of the Project site. The vast majority of delivery truck traffic will be travelling to and from the Project site from that direction. For convenience, these trucks will likely use Alameda Avenue exit.

The proposed Project will also have limited truck deliveries and will not result in the addition of significant 18-wheel truck traffic on S. San Fernando Boulevard for this reason. As Table 5.11-5, Project Trip Generation, in the Draft EIR Section 5.11 shows, the proposed Project is anticipated to have up to 9 delivery trucks on a weekday and 12 daily delivery trucks on a weekend. The addition of these trucks to and from the Project site, would have too small of an effect on the neighborhood to result in the kinds of divisions and disruptions described in the comment. The Project applicant is unique among retailers in being able to control the time and reduced number of truck deliveries. The applicant will restrict truck deliveries, as necessary, to minimize impacts to the neighboring properties.

In addition to 18-wheel delivery trucks during off-peak hours to supply the store with merchandise, IKEA offers a home delivery service using small trucks during operating hours. The traffic from these vehicles, which are more similar to passenger cars than they are to the 18-wheel delivery trucks, are accounted for in the trip generation estimates for the proposed Project.

The comment states that the proposed Project will result in dividing an established community.

The existing uses on the Project site, including Western Studio Service, which currently occupies the Project site, generate truck activity on an irregular schedule throughout the day and night, including during peak hours of auto and pedestrian activity. Construction of the proposed

Project will remove this and other existing uses from the Project site. As such, it will redevelop an existing site within the South San Fernando Commercial Subarea and not divide as communities. Therefore, any concern that redevelopment of the site would result in dividing the community is highly improbable.

**11-2** The comment inquires as to potential traffic noise impacts on residential communities.

The Draft EIR (see Section 5.9) provides analysis of noise on surrounding land uses, including nearby residential uses, parks, and schools.

As noted in the Draft EIR, traffic noise is the dominant noise source in the area, originating from major roads such as Alameda Avenue, S. San Fernando Boulevard, Victory Boulevard, and the Golden State Freeway (I-5). The existing ambient noise environment location points for the roadways in the Project area were determined by utilizing the Project's traffic study. Monitoring locations in the Project vicinity were selected based on the highest volume of traffic and distance in relation to the proposed Project site and residential communities. As shown, roadway noise levels range from a low of 53.5 to a high of 72.0 A-weighted decibels (dB[A]) at 50 feet from roadway centerline. It is important to note that these monitored noise levels reflect short-term noise levels experienced during the weekday peak AM hour.

In addition to the monitored noise levels, noise levels based on existing traffic data were calculated using the FHWA Noise Prediction Model (FHWA-RD-77-108). This model estimates the average noise level in dB(A) CNEL along a given roadway segment based on traffic volumes, vehicle mix, posted speed limits, roadway geometry, and site conditions. The model calculates noise associated with a specific line source and the results characterize noise generated by vehicle traffic along the specific roadway segment. Average vehicle noise rates utilized in the FHWA model were modified to reflect average vehicle noise rates identified for California by the California Department of Transportation (Caltrans). According to data collected by Caltrans, California automobile noise is 0.8 to 1.0 dB(A) louder than national levels, while medium and heavy truck noise is 0.3 to 3.0 dB(A) quieter than national levels. Roadway traffic data from the Project traffic report was utilized in completing the noise modeling.

The results of the noise monitoring are provided in the Draft EIR (see Table 5.9-3, Existing Modeled Noise Levels). As shown, roadway modeled noise levels range from 54.1 dBA CNEL to 66.1 dBA CNEL. The modeled results shown reflect a 24-hour noise average, whereas the short-term noise monitoring data, discussed previously, reflect short-term (15-minute) intervals. When comparing the modeling results with the monitored conditions highlighted in Table 5.9-2,

the modeling results are similar to the monitored condition. While some of the monitored locations show a higher range in dBA, these are primarily a result of background noise (construction) and existing traffic at the monitoring location.

Based on the distribution of traffic volumes, noise modeling was conducted for the roadways analyzed. The results of the modeled weekday roadway noise levels are provided in the Draft EIR (see Table 5.9-4, Existing With and Without Project Noise Levels at 75 Feet From Roadway Centerline). As shown, no significant changes in noise would result from the proposed Project.

- 11-3** The comment states that heavy trucks using S. San Fernando Boulevard will impact the LOS of the surrounding intersections, and that S. San Fernando Boulevard is not intended for commercial traffic such as the delivery trucks that would travel to and from the Project site. It notes that S. San Fernando Boulevard is a two-lane road north of Verdugo Avenue, and claims that the combination of truck traffic with the heavy pedestrian traffic in the vicinity will adversely affect intersection LOS.

As described in **Response to Comment 11-1**, delivery truck traffic to and from the proposed Project will be able to access the Project site from E. Providencia Avenue adjacent to S. Bonnywood Place as well as from S. San Fernando Boulevard. Therefore, truck traffic will have the option to avoid S. San Fernando Boulevard if necessary. Deliveries will only occur during off-peak night-time or early morning hours, and therefore would only operate on surface streets during hours when traffic conditions and pedestrian activity are light.

The comment correctly notes that trucks travel through an intersection more slowly than passenger automobiles do. According to the *2010 Highway Capacity Manual* (Transportation Research Board, 2010), passenger car equivalency (PCE) ratios range from 1.5 to 2.5 passenger cars per truck depending on terrain; typically, a PCE of 2.0 is used to represent trucks of the type in question. Using a PCE of 2.0, each truck trip is the equivalent of two ordinary car trips. Therefore, the effect of 12 trucks per day is equivalent to the effect of 24 cars per day, all occurring well outside of peak hours of auto and pedestrian travel.

The comment does not recognize that S. San Fernando Boulevard is classified as a secondary arterial by the *Burbank2035* General Plan south of Verdugo Avenue, including adjacent to the Project site. According to the *Burbank2035* General Plan, secondary arterials may serve regional traffic such as deliveries to the proposed Project to support commercial uses. North of Verdugo Avenue, S. San Fernando Boulevard is classified as a downtown collector, where walkability is a top priority. Delivery traffic to the Project site would not travel on that stretch of S. San Fernando Boulevard.

Finally, the comment does not recognize that much of the development in the area bounded by S. San Fernando Boulevard on the east, I-5 on the west, Verdugo Avenue on the north, and Alameda Avenue on the south is commercial or industrial in nature, and currently generates truck trips through the community. In fact, the existing uses on the Project site, including Western Studio Service, which currently occupies the Project site, generate truck activity on an irregular schedule throughout the day and night, including during peak hours of auto and pedestrian activity. Trucks traveling to and from Western Studio Service use S. San Fernando Boulevard almost exclusively. Construction of the proposed Project will remove this and other existing uses from the Project site, and ultimately will likely lead to a net reduction in truck traffic in the area rather than an increase. Further, all peak period truck traffic to and from the parcels that make up the Project site will be minimized. In addition, IKEA's delivery trucks can be controlled to minimize disruptions to neighboring properties.

Therefore, the concern that delivery trucks to and from the IKEA store traveling on S. San Fernando Boulevard would disrupt and divide the community is highly improbable. LOS analysis is conducted for area intersections during peak hours of traffic, when congestion is highest, because outside of those hours, intersection LOS is typically very good. The addition of a relatively small number of trucks, spread out over many off-peak hours, will not have a noticeable effect on intersection operations.

- 11-4** The comment suggests that loading dock access on S. San Fernando Boulevard for delivery trucks to the proposed Project will result in a significant access impacts as "significant quantities" of large trucks will have significant impacts to traffic flow and pedestrian circulation along S. San Fernando Boulevard.

As described previously in **Response to Comment 11-3**, much of the development in the area bounded by S. San Fernando Boulevard on the east, I-5 on the west, Verdugo Avenue on the north, and Alameda Avenue on the south is commercial or industrial in nature, and currently generates truck trips throughout the community. In fact, the existing uses on the Project site, including Western Studio Service, generate truck activity on an irregular schedule throughout the day and night, including during peak hours of auto and pedestrian activity. Trucks to and from Western Studio Service use S. San Fernando Boulevard almost exclusively. Construction of the proposed Project will remove this and other existing uses from the Project site, and ultimately will likely lead to a net reduction in truck traffic in the area rather than an increase.

The commenter's suggestion to develop an alternative configuration is not warranted based on the technical analysis and less than significant impact conclusion set forth in the Draft EIR.

**From:** Thomas Saito [mailto:tomsaito@pacbell.net]  
**Sent:** Monday, October 21, 2013 1:44 PM  
**To:** Prescott, Patrick  
**Cc:** Brown, Jesse  
**Subject:** Proposed IKEA and vehicle traffic congestion

As a resident of the area between Glenoaks and the foothills, I am very concerned about the vehicle congestion that would result from a huge new IKEA store and the new hotels that will be built soon. I have been driving the streets in the immediate neighborhood for years and feel that I am quite familiar with the traffic patterns and the problem areas. I'm aware that there are a lot of statistics in the EIR but that is not empirical information based upon day to day driving in the area.

1

I am afraid that we residents could face a traffic nightmare that will be similar to the Burbank Blvd. situation that exists between Burbank High and Costco. I realize that some of the increases in traffic congestion can't be accurately predicted because First St. will be reconfigured and the nearby freeway access to the I-5 is still under construction. Nevertheless, it is almost certain that the entire neighborhood will be impacted negatively because the surface streets won't be able to accommodate the increased traffic and the freeway access is already poor.

2

Traffic on San Fernando is already backed up at certain times of the day and it will worsen greatly with the construction of the new hotels and the IKEA store. Also, there will be limited access to IKEA from the streets, which will result in congestion around the few entrances to the parking lot. Verdugo is a narrow and heavily traveled street already. Many drivers use Verdugo to get to the I-5 South onramp. The traffic signals are poorly coordinated, which impedes traffic flow unnecessarily.

3

Providencia, between San Fernando and the I-5, is not congested now but the street will become the main access to IKEA and the congestion there will be great, although it can only be estimated. Between San Fernando and Glenoaks, Providencia is heavily used and it is a narrow street with many apartment buildings lining it.

4

The worst increased traffic congestion will probably occur at the intersection of Alameda and San Fernando. Alameda is already very congested and the size of the street is inadequate to handle increased vehicle traffic. The traffic signals at the intersection are poorly timed and this bad situation is exacerbated by the totally inadequate access to Ralphs/CVS on Alameda that is in a state of gridlock for much of the day. If nothing else, you definitely need to address the problems with the Alameda/San Fernando intersection before a new IKEA is built.

5

I would appreciate your responses to my comments and I would also like to attend the public hearings.

Thank you very much for your attention,

Thomas Saito

**RESPONSE TO LETTER 12: Mr. Thomas Saito, dated October 21, 2013**

- 12-1** The comment expresses concern that vehicular congestion will result from the completion of various projects in the vicinity, including proposed hotels and the proposed IKEA store relocation. It suggests that the data provided in the EIR is not based on empirical day-to-day driving conditions and that residents could face a traffic nightmare.

The traffic analysis included in the Draft EIR is based on empirical traffic count data collected during peak periods (weekday afternoon and Saturday midday peak periods) in the study area. The data was analyzed using the methodology required by the City of Burbank, which was the Critical Movement Analysis (CMA) Circular 212 methodology. Potential significant traffic impacts were assessed based on City of Burbank impact criteria, which accounts for both the amount of traffic added to an intersection and the existing and projected future operating condition of that intersection. As required, mitigation measures were identified for potential significant impacts at the intersections of Flower Street and Alameda Avenue and of S. San Fernando Boulevard and Alameda Avenue.

While the Draft EIR assessed impacts of the proposed IKEA store, it also considered traffic growth from other developments proposed or under construction in the vicinity of the proposed Project. As shown in Table 4.0-1, Related Projects, in Section 4.0 of the Draft EIR, traffic from 17 specific projects in the Project vicinity was added to the future traffic conditions analyses. Collectively, these related projects were anticipated to add up to 53,350 daily trips on a weekday, including 5,690 during the afternoon peak hour, and 23,525 trips on a weekend, including 2,690 during the weekend midday peak hour. In addition to traffic from specific related projects, a 0.54 percent annual ambient traffic growth (2.16 percent total between years 2012 and 2016) was included to account for proposed or completed projects too small to warrant direct inclusion in the traffic study (including the two hotels referenced in the comment, which have low net trip generation due to the associated removal of the existing land uses on their sites). Therefore, the future conditions analysis included a comprehensive analysis of all of the projected traffic growth within the Study Area.

Table 5.11-9, Future (Year 2016) Plus Project Intersection Peak Hour Levels of Service, in the Draft EIR Section 5.11, summarizes the Future Conditions (Year 2016) LOS for the 12 intersections nearest to the Project site, with and without the proposed Project. As it shows, all but three of the intersections would operate at LOS C or better before and after completion of the proposed Project. The three intersections that could operate at LOS D, E, or F during the analyzed peak hours are along Alameda Avenue. All three of those intersections are projected to

operate at LOS D or E during 1 of the analyzed peak hours prior to the addition of Project traffic. Further, implementation of mitigation measures proposed for the Project at the intersections of Flower Street and Alameda Avenue, and of S. San Fernando Boulevard and Alameda Avenue have the potential to improve intersection operating conditions such that they would operate better than projected under Future Without Project Conditions during some peak hours, resulting in a net improvement in operations at those two intersections with completion of the Project and proposed mitigation. The potential intersection operating condition improvement associated with the proposed mitigation measures is shown in Table 5.11-9.

Therefore, the suggestion that traffic conditions will be worsened significantly by the effects of the proposed Project and the hotels proposed in the vicinity is without merit.

- 12-2** The comment notes that future traffic conditions with the proposed Project may not be able to be fully predicted because I-5 is still being widened and reconfigured, and the First Street extension may change traffic patterns. It further claims that surface streets will not be able to accommodate the increase in traffic and that freeway access is already poor.

The traffic analysis presented in the Draft EIR is based on reasonable assumptions regarding the generation and distribution of automobile traffic through the study area as a result of the proposed Project. The trip generation estimates are based on empirical data from other IKEA stores in Southern California, providing the most accurate possible prediction based on regionally local data for the same type of stores. Therefore, the Draft EIR presents a comprehensive and valid analysis of projected traffic conditions with the proposed Project.

This comment assumes there is no available capacity to absorb additional traffic on the street system. In the vicinity of the Project site, which is the focus of the comment, most of the intersections operate at LOS A or B (the best two operating conditions) during both the weekday afternoon and Saturday midday peak hours, which were analyzed in the Draft EIR. Both existing conditions and projected future conditions (year 2016) bear this out.

Table 5.11-6, Existing (Year 2012) Plus Project Conditions Intersection Peak Hour Level of Service, and Table 5.11-9, Future (Year 2016) Plus Project Intersection Peak Hour Levels of Service, show the Existing Conditions (Year 2012) and Future Conditions (Year 2016) and, respectively, with and without traffic from the proposed Project, for the 12 intersections nearest to the Project site. As Table 5.11-6 shows, under Existing Conditions With or Without the Proposed Project, 10 of these 12 intersections operate at LOS C or better during both analyzed peak hours, with most operating at LOS A or B. Only the intersections of Flower Street and

Alameda Avenue and of S. San Fernando Boulevard and Alameda Avenue would operate at LOS D or E with or without the proposed Project. As shown, and as described in **Response to Comment 12-1**, under Future Conditions, 9 of the 12 intersections would operate at LOS C or better during both peak hours. The three intersections on Alameda Avenue would operate at LOS D or E during one or both peak hours with and without the proposed Project.

Further, Table 5.11-18, Existing (Year 2012) Plus Project With Mitigation Intersection Peak Hour Levels of Service, and Table 5.11-19, Future (Year 2016) Plus Project With Mitigation, in the Draft EIR Section 5.11, show the results of the intersection mitigation measures proposed for the intersections of Flower Street and Alameda Avenue and of S. San Fernando Boulevard and Alameda Avenue. As shown, the proposed mitigation measures have the potential to improve intersection operating conditions such that they would operate better than projected under Existing Conditions or Future Without Project conditions during some peak hours, resulting in a net improvement in operations at those two intersections with completion of the Project and proposed mitigation.

Intersections operating at LOS D or better have capacity to accommodate increased traffic volumes, and most of the intersections nearest the Project site operate at LOS A, B, or C. Intersections along Alameda Avenue already operate at LOS D and are projected to worsen to LOS E when future traffic growth and Project traffic are added. However, the proposed intersection mitigations have the potential to neutralize the effect of Project traffic at the two impacted intersections on Alameda Avenue.

With regard to freeway access, please note that the Project site is located very close to I-5 between two full-access interchanges: at Alameda Avenue to the south, and at Olive Avenue and Verdugo Avenue to the north. The I-5 northbound ramps at Olive Avenue and the I-5 southbound ramps at Verdugo Avenue provide nearly direct access to First Street, which will lead directly into the IKEA parking lot. While freeway access may not serve the commenter as well as he would prefer, the existing access ramps will be very convenient for IKEA customers. The proximity of these ramps to the primary IKEA access point at First Street and E. Providencia Avenue will help to limit the amount of regional Project traffic on other intersections in and around the Study Area.

- 12-3** The comment states that S. San Fernando Boulevard already experiences congestion during peak periods and that it will worsen with construction of the proposed hotels and the proposed IKEA store. In addition, the comment states that IKEA will have limited access and that

congestion will occur around its entrances. It also notes that traffic signals on Verdugo Avenue, a common route to southbound I-5, are poorly coordinated.

Please refer to **Responses to Comment 12-1** and **Responses to Comment 12-2** for a detailed explanation of existing and future conditions in the vicinity of the proposed Project before and after its completion.

As designed, the proposed Project will provide four access points, including three intended for public access and one on S. San Fernando Boulevard that will be shared access for IKEA delivery trucks and the adjacent property south of the Project site. Primary customer access will be provided at the new intersection of First Street and E. Providencia Avenue, with traffic primarily approaching the Project site via the proposed First Street Extension between Santa Anita Avenue and E. Providencia Avenue. Secondary access would be provided via a signalized, full-access driveway on S. San Fernando Boulevard across from E. Elmwood Avenue, and another secondary access point would provide access from the lower parking level and loading docks to E. Providencia Avenue near S. Bonnywood Place. As previously noted, a fourth access point on S. San Fernando Boulevard would be for IKEA delivery trucks as well as to serve the adjacent property to the south. Finally, the proposed Project will have a First Street address, and directional material will promote customer use on the First Street primary entrance.

In total, these four access points will provide plenty of capacity for the anticipated volume of vehicular traffic to and from the proposed Project. The Draft EIR includes Appendix 5.11, Traffic Study, which in turn includes Appendix E, Driveway Analysis, which provides a comprehensive analysis of driveway levels of service and showed that each of the proposed driveways would operate at LOS A, B, or C under Future With Project (Year 2016) Conditions, that is, well within the available capacity.

The comment also notes that traffic signals on Verdugo Avenue are inadequately timed to allow smooth progression of traffic to and from I-5. The Project is anticipated to add traffic to Verdugo Avenue to the west of First Street for customers arriving from and departing to I-5 southbound. The Project is not anticipated to add substantial amounts of traffic to Verdugo Avenue east of First Street that would add to any current congestion.

- 12-4** The comment states that E. Providencia Avenue will become congested as the future main access point to IKEA. It notes that E. Providencia Avenue is narrow but heavily used between S. San Fernando Boulevard and Glenoaks Boulevard.

E. Providencia Avenue is classified as a collector street east of S. San Fernando Boulevard, and thus is expected to carry residential traffic from uses on that street and from adjacent local streets that connect to it. As shown in Figure 5.11-5, Project-Only Peak Hour Traffic Volumes, in the Draft EIR Section 5.11, only three Project trips are expected on this stretch of E. Providencia Avenue during the weekday afternoon peak hour and approximately 15 trips are expected during the weekend midday peak hour.

Given the regional nature of the customer base for the proposed Project, the majority of the traffic to and from the Project site will be from outside of the City of Burbank. Therefore, primary access to the Project site will be from the I-5 freeway, and the most convenient way to travel from I-5 to the Project site is via the proposed First Street Extension. While the Project Site access point at the end of First Street Extension is on E. Providencia Avenue, nearly all of the traffic at this driveway will use the First Street Extension rather than E. Providencia Avenue itself. E. Providencia Avenue is not expected to experience a significant increase in traffic as a result of the proposed Project.

- 12-5** The comment states that traffic congestion will worsen at the intersection of Alameda Avenue and S. San Fernando Boulevard. It claims that Alameda Avenue cannot accommodate increased traffic volumes, that the traffic signals are poorly timed, and that there is inadequate access to the Ralphs/CVS retail center on the northwest corner of S. San Fernando Boulevard and Alameda Avenue, resulting in gridlock.

Table 5.11-6, Existing (Year 2012) Plus Project Conditions Intersection Peak Hour Level of Service, and Table 5.11-8, Future (Year 2016) Without Project Intersection Peak Hour Levels of Service, in the Draft EIR Section 5.11 show the intersection operating conditions for 12 intersections nearest the Project site under Existing (Year 2012) and Future (Year 2016) Conditions, respectively, with and without the proposed Project. The comment correctly notes that Project traffic will worsen intersection operating conditions prior to mitigation. As noted in the Draft EIR, the Project would result in a significant impact at the intersection of Flower Street and Alameda Avenue during the weekday afternoon peak hour under Future With Project (Year 2016) Conditions and classification as an “affected” intersection during the weekend midday peak hour under both Existing With Project (Year 2012) Conditions and Future With Project (Year 2016) Conditions. The Project would result in a significant impact at the intersection of S. San Fernando Boulevard and Alameda Avenue during both the weekday afternoon and weekend midday peak hours under both Existing With Project (Year 2012) Conditions and Future With Project (Year 2016) Conditions. However, the comment ignores the effect of proposed mitigation for Project impacts at these two intersections, which would reduce the identified

impacts below the level of significance and in some cases would result in net improvements in intersection operating conditions from conditions without the proposed Project.

As described in the Draft EIR Section 5.11, the intersection of Flower Street and Alameda Avenue would be improved by striping an exclusive southbound right-turn lane. This improvement would serve to provide one shared left-turn/through lane and one exclusive right-turn lane in the southbound direction, shortening the amount of signal green time required to serve the southbound approach and allowing more of that signal green time to be spent on the eastbound and westbound traffic of Alameda Avenue. As shown in Table 5.11-18, Existing (Year 2012) Plus Project With Mitigation Intersection Peak Hour Levels of Service, and Table 5.11-19, Future (Year 2016) Plus Project With Mitigation, in the Draft EIR, with this improvement intersection operating conditions would be improved during the weekday afternoon peak hour as compared to conditions without the proposed Project. In other words, following mitigation, the intersection will experience a net improvement in operations—even after the addition of Project traffic—during the weekday afternoon peak hour. During the weekend midday peak hour, the intersection operating conditions would be substantially unchanged after the implementation of mitigation and the addition of Project traffic. This mitigation measure would also result in the full mitigation of the identified Project impact at the intersection of Flower Street and Alameda Avenue during the weekday afternoon peak hour and the status as an “affected” intersection during the weekend midday peak hour.

At the intersection of S. San Fernando Boulevard and Alameda Avenue, three potential mitigation options were proposed to mitigate Project impacts. Under Option 1, the eastbound approach of the intersection would be modified to add a second left-turn lane. Under Option 2, the southbound approach of the intersection would be widened to add an exclusive right-turn lane. Under Option 3, both the eastbound second left-turn lane of Option 1 and the southbound exclusive right-turn lane of Option 2 would be implemented in tandem.

As shown in Tables 5.11-18 and 5.11-19, Option 1 would result in a modest improvement over intersection operating conditions without the proposed Project during the weekday afternoon peak hour, and a slight worsening over intersection operating conditions without the proposed Project during the weekend midday peak hour. Overall, implementation of Option 1 would result in a substantially unchanged operating condition from conditions without the proposed Project. Option 1 would also result in the full mitigation of the identified Project impact at the intersection of S. San Fernando Boulevard and Alameda Avenue during both analyzed peak hours under both Existing With Project (Year 2012) Conditions and Future With Project (Year 2016) Conditions.

Option 2 would result in only modest benefits to intersection operating conditions during either the weekday afternoon or weekend midday peak hours. With implementation of Option 2, the intersection of S. San Fernando Boulevard and Alameda Avenue would remain impacted during both the weekday afternoon and weekend midday peak hours under both Existing With Project (Year 2012) Conditions and Future With Project (Year 2016) Conditions.

Option 3, like Option 1, would result in the full mitigation of the identified Project impact at the intersection of S. San Fernando Boulevard and Alameda Avenue during both analyzed peak hours under both Existing With Project (Year 2012) Conditions and Future With Project (Year 2016) Conditions. It would also result in additional improvements to intersection operating conditions over what was identified with implementation of Option 1. With implementation of Option 3, the improvement in net operating conditions during the weekday afternoon peak hour compared to Future Without Project (Year 2016) Conditions would be greater than with implementation of Option 1. In addition, during the weekend midday peak hour, intersection operating conditions would be substantially unchanged compared to conditions without the proposed Project, and even slightly improved under Future With Project (Year 2016) Conditions. Option 3 would provide substantial benefits to vehicular traffic through the intersection both during the peak hours analyzed for the Project and outside of those hours.

In summary, while the Project would add traffic to the intersections on Alameda Avenue, which are already congested, the mitigation measures proposed in the Transportation Study would result in substantially unchanged conditions at those locations, and even improvement in some cases.

The comment also states that the signals on Alameda Avenue are poorly timed. As described previously, the proposed Project mitigation measures will result in the addition of turn lanes at the intersections of Flower Street and Alameda Avenue and of S. San Fernando Boulevard and Alameda Avenue. Along with those improvements, signal timing would be revisited and revised to optimize for the new lanes. The City of Burbank will ensure that these signals are timed for maximum efficiency and throughput along Alameda Avenue.

Finally, the comment states that there is inadequate access to the retail center on the northwest corner of the intersection of S. San Fernando Boulevard and Alameda Avenue, which contains a Ralphs grocery store and a CVS pharmacy, among other uses. Access to this property is affected by congestion at the intersection itself, and therefore, any improvements to intersection operation will also result in a commensurate improvement to access to this retail center. As described previously, proposed Project mitigation could result in improvements to the operating

conditions of the intersection of S. San Fernando Boulevard and Alameda Avenue beyond the conditions without the proposed Project. Further mitigation to access constraints at third-party properties is beyond the scope of the proposed Project and is not warranted.



October 28, 2013

Patrick Prescott, AICP  
Deputy City Planner  
City of Burbank

Re: the proposed IKEA store

Dear Mr. Prescott:

While we favor the IKEA store there is a major omission in the plan to which I want to draw your attention.

There are three senior communities at the intersection of S. San Fernando Boulevard and Verdugo Avenue. A significant number of the residents do not drive and they walk along the corridor to access Ralph's, Trader Joe's, Walgreens and CVS on one end, and the Media Center Mall, AMC, shops and restaurants on the other end. Some use wheelchairs, many use walkers or canes, and some are blind.

The Draft EIR for the proposed IKEA Store does not adequately mitigate the impacts along the S. San Fernando corridor for the pedestrian, elderly and disabled population. As the situation is today, the intersection of S. San Fernando Boulevard and Verdugo is not safe for any pedestrians. Adding a single additional car, without mitigation, will make a bad situation horribly worse. Our residents are already threatened daily at that intersection and it is common for them to be brushed by cars while they use the crosswalk. In fact, a car hit one of them! He was unharmed, but the driver of the car was indifferent, offered no assistance and kept driving.

1

Thank you very much for your attention and consideration.

Very truly yours,

  
Maureen Kellen-Taylor, Ph.D.  
Chief Operating Officer  
EngAGE at 32 sites including  
the Burbank Senior Artists Colony,  
240 East Verdugo Ave., Suite 100  
Burbank, CA 91502

[www.engagedaging.org](http://www.engagedaging.org)

Anchor: Experience Talks radio on Saturdays 830 am. KPFB 90.7 FM

**RESPONSE TO LETTER 13: Engage, dated October 28, 2013**

- 13-1** The comment states that potential pedestrian impacts exist along S. San Fernando Boulevard, including potential impacts to elderly and disabled pedestrians at the intersection of S. San Fernando Boulevard and Verdugo Avenue.

Please refer to **Response to Comments 9-5** and **9-6**.

As described in **Response to Comment 9-5**, S. San Fernando Boulevard is classified as a secondary arterial south of Verdugo Avenue in the *Burbank2035* General Plan, where walkability is an important consideration but automotive traffic is a primary purpose. Continuous sidewalks are provided on both sides of S. San Fernando Boulevard, and handicap accessible curb cutouts are provided at each intersection. Pedestrian crosswalks and actuated pedestrian walk/don't walk indicators are provided at signalized intersections including Verdugo Avenue, E. Providencia Avenue, and Alameda Avenue. No direct pedestrian mitigation measures are proposed because the Project is not anticipated to result in a significant impact on pedestrian facilities.

The Project includes several design features that will enhance the pedestrian experience and increase pedestrian safety along the Project site's frontage on S. San Fernando Boulevard. Adjacent to Project frontage on S. San Fernando Boulevard, the existing 7-foot sidewalk would be widened to 15 feet, which is consistent with the *Burbank2035* General Plan guidelines for secondary arterials located within the South San Fernando Commercial Subarea. The Project would also provide landscaped buffer areas on S. San Fernando Boulevard both north and south of the proposed Project access point across from Elmwood Avenue.

In addition, the implementation of a new traffic signal on S. San Fernando Boulevard at the Project access point across from Elmwood Avenue will include new controlled crosswalks across S. San Fernando Boulevard as well as across Elmwood Avenue and the Project driveway. The existing pedestrian crosswalks at E. Providencia Avenue and at Alameda Avenue are approximately 1,500 feet apart, more than one quarter mile. The new pedestrian crosswalks at Elmwood Avenue will halve the distance between successive crosswalks on S. San Fernando Boulevard; these crosswalks will be designed to the latest City and industry standards. These improvements, which are shown on the Project site plan in Figure 3.0-5 of the Draft EIR, will encourage pedestrian activity and enhance walkability and safety in the vicinity of the Project site.

It is also important to note that the proposed Project is not expected to add significant levels of traffic on S. San Fernando Boulevard between Verdugo Avenue and the Project access point across from Elmwood Avenue. As shown in Figure 5.11-5, Project-Only Peak Hour Traffic Volumes, of the Draft EIR, the Project is anticipated to add approximately 4 trips to this stretch during the weekday afternoon peak hour and approximately 15 trips during the weekend midday peak hour. This is due to the fact that the primary entrance to the proposed Project will be via the First Street Extension, and therefore it is anticipated that much of Project traffic will use this section of S. San Fernando Boulevard.

### 3.0 REVISIONS TO THE DRAFT EIR

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In accordance with section 15132 of the *CEQA Guidelines*, this section presents the changes that were made to the Draft EIR to clarify or amplify its text in response to comments. Such changes are insignificant as the term is used in Section 15088.5(b) of the *CEQA Guidelines*.

Changes to the Draft EIR use ~~strike-out~~ and double underline format (not track changes) to reflect all changes made to the Draft EIR. Each change is preceded by a brief explanation of the reason for the change.

In response to **Comment 6-1** from the Burbank Community Day School, the following revision has been made to the EIR:

#### 1.6 SUMMARY OF PROJECT IMPACTS

Page 1.0-10

This EIR is focused on those environmental impact topics identified by the City as having potentially significant impacts during the scoping process conducted for this Project. **Table 1.0-1, IKEA Retail Store Project Summary of Impacts**, identifies the level of significance of the impacts for each topic addressed in this EIR.

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**Table 1.0-1**  
**IKEA Retail Store Project**  
**Summary of Impacts**

<b>Significant and Unavoidable Impact</b>	<b>Less than Significant Impact With Mitigation</b>	<b>Less than Significant Impact/ No Impact</b>
Air Quality during operations	<del>Aesthetics</del>	<u>Aesthetics</u>
Noise and Vibration during construction	Air Quality during construction	Biological Resources
	Cultural Resources	Mineral Resources
	Geology and Soils	Population and Housing
	Greenhouse Gas	Public Services
	Hazards/Hazardous Materials	Recreation
	Hydrology and Water Quality	<u>Utilities and Service Systems</u>
	Land Use	
	Operational Noise	
	Traffic and Transportation	
	<del>Utilities and Service Systems</del>	

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## Section 5.8, Land Use

### Section 5.8.1, Existing Conditions

Page 5-2

#### Surrounding Land Uses

The proposed Project is located in an area that is developed predominantly with industrial uses. A mix of commercial and multifamily residential uses is located along S. San Fernando Boulevard. A commercial shopping center including a Ralphs grocery store is located to the south of the Project site. To the north along E. Cedar Avenue and E. Providencia Avenue are mostly commercial and light industrial uses, with the Robert R. Ovrom Park and Community Center located at the corner of E. Cedar Avenue and S. San Fernando Boulevard and Little Angels Garden School, located on S. San Fernando Boulevard, directly north of the proposed Project site. In addition, the following uses are nearby:

- Townhouses located at the northeast corner of Elmwood and S. San Fernando Boulevard
- Disabled housing located at the corner of E. Providencia and S. San Fernando Boulevard
- The Burbank Senior Artist Colony located at the southeast corner of E. Verdugo Avenue and S. San Fernando Boulevard
- The Wesley Tower (senior housing) located at the northeast corner of E. Verdugo Avenue and S. San Fernando Boulevard
- Senior housing located at the northwest corner of E. Verdugo Avenue and S. San Fernando Boulevard

In response to **Comment 4-7**, Los Angeles County Metropolitan Transportation Authority, the following mitigation measure has been added to the EIR:

## Section 5.11, Transportation and Traffic

### Section 5.11.9.2, Construction Traffic Mitigation

Page 5.11-74

**5.11-4:** Prior to the initiation of demolition and/or construction activities, the Applicant will comply with the request and alert the construction contractor of existing bus facilities

and services present in the area and contact Metro Bus Operations Control Special Events Coordinator in order to avoid temporary impacts during construction.